

The Corrigan Law Firm
54-B West Front Street
Keyport, New Jersey 07735
732-888-3868
732-888-9055 (Fax)
Counsellorcorrigan@msn.com

David F. Corrigan, Esq.+

+ Certified by the Supreme Court of New Jersey
As a Civil Trial Attorney

November 30, 2018

Via Electronic Mail

Victor M. Polce, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
October, 2018

Dear Mr. Polce:

Enclosed please find my statement of services rendered for October, 2018.

Kindly process for payment at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,



David F. Corrigan

The Corrigan Law Firm

Counselors At Law
54-B West Front Street
Keyport, NJ 07735

PH.: (732) 888-3868

FAX: (732) 888-9055

Billing Statement

for services rendered: October, 2018

TO: Borough of Wallington

10-5-18	Review email from client re: clerk deficiencies; confer with client. Re: Clerk Deficiencies	.5 hrs.
10-5-18	Review emails concerning meeting minute concerns, et. al; confer with client. Re: Clerk Issues	.5 hrs.
10-17-18	Review emails relating to insubordination, abandonment of job, etc.; conferences with client; review of file. Re: Clerk Issues	2.0 hrs.
10-22-18	Discussions with client re: necessity to prepare Rice notice. Re: Rice Notice	.5 hrs.
10-24-18	Commence preparing for council meeting and potential employment action. Re: Clerk Issues	2.0 hrs.
10-25-18	Continued review of file; prepare for and attendance at client meeting to discuss potential employment action. Re: Clerk Issues	9.5 hrs.
10-29-18	Review of emails; confer with client regarding abuse of sick time. Re: Clerk Issues	.5 hrs.
	TOTAL HOURS	15.5 hrs.
	15.5 HOURS @ \$185.00 PER HOUR	\$2,867.50
	Expenses (See attached)	\$-----
	TOTAL AMOUNT DUE	\$2,867.50

Please make checks payable to David F. Corrigan, Esq.

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As a Civil Trial Attorney

November 30, 2018

Via Electronic Mail

Victor M. Polce, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
September, 2018

Dear Mr. Polce:

Enclosed please find my statement of services rendered for September, 2018.

Kindly remit payment at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,


David F. Corrigan

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54-B West Front Street
Keyport, NJ 07735

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Billing Statement

for services rendered: September, 2018

TO: Borough of Wallington

9-1-18	Review letter from clerk re: statement of position re: interview; confer with client; review client email; prepare response. Re: Clerk Performance Evaluation	1.3 hrs.
9-5-18	Review and outline response to clerk email; review statute re: <u>Rice</u> notice issues. Re: Clerk Performance Evaluation	.5 hrs.
9-7-18	Review emails and confer with client re: OPRA requests. Re: OPRA Issues	1.2 hrs.
9-26-18	Review and analyze email from Council members. Re: DOKA/Clerk Issue	.8 hrs.
9-27-18	Review email re: Administrator's complaint re: clerk performance; confer with client regarding same; review responding email. Re: Clerk Performance	1.0 hrs.
	TOTAL HOURS	4.8 hrs.
	4.8 HOURS @ \$185.00 PER HOUR	\$888.00
	Expenses (See attached)	\$-----
	TOTAL AMOUNT DUE	\$888.00

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As a Civil Trial Attorney

September 26, 2018

Via Electronic Mail

Victor M. Polce, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
August, 2018

Dear Mr. Polce:

Enclosed please find my statement of services rendered for August, 2018.

There is a past due amount of \$11,322.00. Would you kindly pay this immediately.

Thank you for your attention to this matter.

Very Truly Yours,


David F. Corrigan

The Corrigan Law Firm

Counselors At Law
54-B West Front Street
Keyport, NJ 07735

PH.: (732) 888-3868
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Billing Statement

For services rendered: August, 2018

TO: Borough of Wallington

8-1-18	Review file concerning need for information; draft letter regarding information sought; receipt and review of documents received.	2.5 hrs.
8-2-18	Prepare for and attendance at meeting with client. Re: Pending Matters	3.5 hrs.
8-26-18	Confer with Township Attorney; conferences with Police Department re: confidential issue; legal research; draft memo to client. Re: Police Opinion	6.7 hrs.
8-31-18	Confer with client; draft letter to clerk; review response.	.8 hrs.
	TOTAL HOURS	13.5 hrs.
	13.5 HOURS @ \$185.00 PER HOUR	\$2,497.50
	Past Due Amount	\$11,322.00
	TOTAL AMOUNT DUE	\$13,819.50

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October 22, 2019

Hector Olmo, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
May, 2019

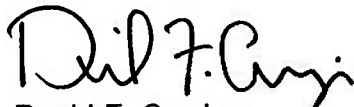
Dear Mr. Olmo:

Enclosed please find my statement of services rendered for May, 2019.

Kindly process for payment at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,


David F. Corrigan

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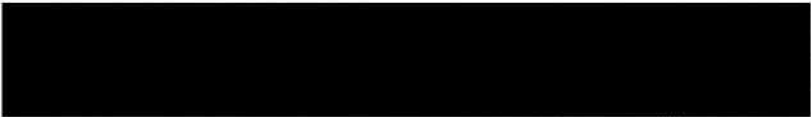
Billing Statement

for services rendered: May, 2019

TO: Borough of Wallington

5-2-19	Review deputy clerk letter; conferences with client; preliminary review of law; draft response. Re: Deputy Clerk	3.0 hrs.
5-6-19	Conference call with client and Business Administrator re: employee issue. Re: Personnel Matter	.5 hrs.
5-7-19	Commence research OAL rules for discovery. Re: Baginski	.3 hrs.
5-7-19	Review <u>N.J.A.C.</u> 1:1-10.1 through 10.6 Re: Baginski	1.2 hrs.
5-7-19	Draft legal memo regarding the discovery procedures in the OAL. Re: Baginski	1.3 hrs.
5-9-19	Draft memo to employee re: insubordination; conferences with client. Re: Employee Insubordination	.8 hrs.
5-10-19	Conferences with client re: negotiations; exchange of emails. Re: Negotiations	.5 hrs.
5-10-19	Brief review of Baginski Tenure Charges. Re: Baginski	.3 hrs.
5-10-19	Review of letter transferring matter to OAL; draft memo to client. Re: Baginski	.2 hrs.
5-10-19	Draft OAL interrogatories for Baginski. Re: Baginski	1.6 hrs.
5-10-19	Draft OAL Requests for Production of Documents. Re: Baginski	1.4 hrs.

5-14-19	Review files; meeting with client re: pending matters. Re: Pending Matters	3.5 hrs.
5-14-19	Review and analysis history of salary increases. [REDACTED]	.5 hrs.
5-20-19	Conferences re: Borough Attorney; review and analysis of Complaint. Re: Fehl	1.2 hrs.
5-21-19	Review court notices; draft memo to client regarding same issue. Re: Baginski	.5 hrs.
5-22-19	Conferences with client and outside attorney re: discovery requests and responding to same. Re: Fehl	2.8 hrs.
5-23-19	Review service and related issue with Borough Attorney. Re: Service of Process Issue	.5 hrs.
5-24-19	[REDACTED]	.9 hrs.
5-24-19	Review <u>Rice v. Union County Regional High School Board of Education</u> , 155 N.J. Super. 64, 73 (App. Div. 1977) Re: Deputy Clerk Personnel Issue (OPMA)	1.1 hrs.
5-24-19	Review <u>Kean Federation of Teachers v. Ada Morell</u> (A-84-16) (078926) Re: Deputy Clerk Personnel Issue (OPMA)	1.6 hrs.
5-24-19	Preliminary review and analyze audio file sent by Wallington. Re: Baginski	.6 hrs.
5-28-19	Research case law on tenure charges filed against municipal clerk Re: Baginski	.5 hrs.
5-28-19	Review <u>N.J.S.A.</u> 40A:9-133.7 and 134 Re: Baginski	.6 hrs.
5-28-19	Review <u>Rieger v. Twp. of Fairfield</u> , 121 F. App'x 944 (3d Cir. 2005) Re: Baginski	.6 hrs.

5-28-19	Review <u>Fox v. Twp. of Jackson</u> , 64 F. App'x 338 (3d Cir. 2003) Re: Baginski	.5 hrs.
5-28-19	Review <u>McKeever v. Twp. of Wash.</u> , 236 F. Supp. 2d 400 (D.N.J. 2002) Re: Baginski	.6 hrs.
5-28-19	Review <u>Carlson v. Twp. of Lower Alloways Creek</u> , No. 06-3779 (RBK/KMW), 2009 U.S. Dist. LEXIS 70700 (D.N.J. Aug. 12, 2009) Re: Baginski	.6 hrs.
5-28-19	Review <u>Gooden v. Twp. of Monroe</u> , No. 05-2472 (RBK), 2006 U.S. Dist. LEXIS 9023 (D.N.J. Mar. 7, 2006) Re: Baginski	.7 hrs.
5-28-19	Research case law re: burden of proof for tenure charges Re: Baginski	.6 hrs.
5-28-19	Search tenure and burden of proof; review Brief and Opinion in previous related cases. Re: Baginski	.8 hrs.
5-28-19	Review <u>Am. Asso. of Univ. Professors, Bloomfield Coll. Chapter v. Bloomfield Coll.</u> , 136 N.J. Super. 442 (App. Div. 1975) Re: Baginski	.7 hrs.
5-28-19		1.3 hrs.
5-28-19		.4 hrs.
5-28-19	Exchange of emails and conferences with client re: app't of hearing officer. Re: Appointment of Hearing Officer	.5 hrs.
5-28-19	Review file; review court order; draft pre-hearing memo to court. Re: Baginski	2.6 hrs.
5-29-19	Review and respond to issue regarding deposition. Re: Baginski	.8 hrs.

5-29-19	Conferences with client re: crossing guard issues; prepare information memo; review, revise and editing same. Re: Crossing Guard Negotiations	2.0 hrs.
5-29-19	Transcribe April 25, 2019 Council meeting in regards to the discussion of the February minutes. Re: Brynczka (OPMA)	.9 hrs.
5-29-19	[REDACTED]	.8 hrs.
5-29-19	Review and analysis of Baginski position statement; prepare for and attendance at court conference. Re: Baginski	3.5 hrs.
5-29-19	[REDACTED]	1.5 hrs.
5-30-19	Review/analysis pre-hearing order; draft letter to client. Re: Baginski	1.2 hrs.
5-30-19	Conferences with client; preliminary legal research; prepare communication to union; review, revise and editing of same. Re: Crossing Guard Negotiations	2.2 hrs.
5-30-19	[REDACTED]	.4 hrs.
5-30-19	[REDACTED]	1.2 hrs.
5-30-19	[REDACTED]	.7 hrs.
5-30-19	[REDACTED]	.7 hrs.
5-30-19	[REDACTED]	.5 hrs.

5-30-19	[REDACTED]	.5 hrs.
5-30-19	[REDACTED]	.8 hrs.
5-30-19	[REDACTED]	1.1 hrs.
5-30-19	[REDACTED]	.5 hrs.
5-31-19	Conferences with client; edit communications. Re: Crossing Guard Negotiations	1.0 hrs.
5-31-19	Conferences with client re: OPRA issue; preliminary legal research. Re: OPRA Issue	2.5 hrs.
5-31-19	[REDACTED]	.3 hrs.
5-31-19	[REDACTED]	.4 hrs.
5-31-19	[REDACTED]	.4 hrs.
5-31-19	[REDACTED]	.3 hrs.
5-31-19	[REDACTED]	.3 hrs.
5-31-19	[REDACTED]	.4 hrs.
5-31-19	[REDACTED]	.3 hrs.

5-31-19		1.4 hrs.
	TOTAL HOURS	61.9
	61.9 HOURS @ \$185.00 PER HOUR	\$11,451.50
	Expenses (See attached)	\$-----
	TOTAL AMOUNT DUE	\$11,451.50

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October 22, 2019

Via Electronic Mail

Hector Olmo, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
June, 2019

Dear Mr. Olmo:

Enclosed please find my statement of services rendered for June, 2019.

Kindly process for payment at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,



David F. Corrigan

The Corrigan Law Firm

Counselors At Law
54-B West Front Street
Keyport, NJ 07735

PH.: (732) 888-3868
FAX: (732) 888-9055

Billing Statement

for services rendered: June, 2019

TO: Borough of Wallington

6-1-19	Review issues related to overtime/state comptroller's report; draft OPRA request to Comptroller's office. Re: Baginski	1.5 hrs.
6-3-19	Review discovery documents. Re: Baginski	.1 hrs.
6-3-19	Review <u>N.J.S.A. § 47:1A-1.1 (OPRA)</u> and the provisions that are not considered government records Re: OPRA Request	.3 hrs.
6-3-19	Research the deliberative process exception to OPRA Re: OPRA Request	.4 hrs.
6-3-19	Review <u>Gannett N.J. Partners, LP v. Cty. of Middlesex</u> , 379 N.J. Super. 205, 219 (App. Div. 2005); Re: OPRA Request	.9 hrs.
6-3-19	Review <u>Educ. Law Ctr. v. N.J. Dept of Educ.</u> , 198 N.J. 274 (2009); Re: OPRA Request	.9 hrs.
6-3-19	Review <u>In re the Liquidation of Integrity Ins. Co.</u> , 165 N.J. 75, 84-85, 754 A.2d 1177 (2000) Re: OPRA Request	1.1 hrs.
6-3-19	Prepare status report to client. Re: Baginski	1.5 hrs.
6-3-19	Exchange of emails re: witness statement. Re: Baginski	.5 hrs.
6-4-19	Draft status report to Borough Attorney. Re: Baginski	.5 hrs.
6-4-19	Review <u>Ciesla v. N.J. Dep't of Health & Sr. Servs.</u> , 429 N.J. Super. 127 (App. Div. 2012) Re: Wallington	.1 hrs.

6-4-19	Review <u>Libertarians for Transparent Gov't v. Gov't Records Council</u> , 453 N.J. Super. 83 (App. Div. 2018) Re: OPRA Request	.6 hrs.
6-4-19	Review <u>Larkins v. Solter</u> , 450 N.J. Super. 519 (App. Div. 2017) Re: OPRA Request	.5 hrs.
6-4-19	Review <u>Bozzi v. City of Atl. City</u> , 434 N.J. Super. 326 (App. Div. 2014) Re: OPRA Request	.5 hrs.
6-4-19	Draft legal memo regarding the deliberative material exception to OPRA and leading cases Re: OPRA Request	3.5 hrs.
6-5-19	Conferences and exchange of emails re: responding to subpoena. Re: Fehl	.5 hrs.
6-5-19	Review, revise and edit discovery requests. Re: Baginski	1.3 hrs.
6-5-19	Exchange of emails and draft letter to adversary re: subpoena compliance. Re: Fehl	.5 hrs.
6-6-19	Review and initial analysis of <u>Baginski</u> discovery demands. Re: Baginski	1.5 hrs.
6-7-19	Draft letter to Rindosh responding to subpoena <u>duces tecum</u> . Re: Fehl	.5 hrs.
6-7-19	Draft opinion letter to Borough Attorney regarding deliberative material exception to OPRA. Re: OPRA Request	.5 hrs.
6-7-19	[REDACTED]	.7 hrs.
6-7-19	[REDACTED]	.5 hrs.
6-7-19	[REDACTED]	.7 hrs.

6-7-19	[REDACTED]	.4 hrs.
6-7-19	[REDACTED]	.6 hrs.
6-7-19	[REDACTED]	.4 hrs.
6-7-19	[REDACTED]	.6 hrs.
6-7-19	[REDACTED]	.4 hrs.
6-7-19	[REDACTED]	.9 hrs.
6-7-19	[REDACTED]	.8 hrs.
6-7-19	[REDACTED]	2.8 hrs.
6-8-19	Receipt and review Comptroller's response; preliminary research regarding same. Re: Baginski	1.5 hrs.
6-10-19	[REDACTED]	.8 hrs.
6-11-19	Research Wallington municipal ordinances for harassment policies Re: Police Harassment Investigation	.7 hrs.

6-11-19	Research Wallington employee handbook for policies regarding harassment Re: Police Harassment Investigation	.7 hrs.
6-11-19	Research Wallington employee handbook for policies on outside employment Re: Police Harassment Investigation.	.5 hrs.
6-11-19	Commence preparation of report; prepare report. Re: Police Harassment Investigation	3.5 hrs.
6-14-19	Read and study file; outline to police department inquiries that need to be answered to finish investigation. Re: Police Harassment Investigation	2.5 hrs.
6-17-19	Receipt and review of police department documents requested. Re: Police Harassment Investigation	2.5 hrs.
6-23-19	Prepare for and meeting with I.A. Lieutenant to review documents and interview. Re: Police Harassment Investigation	3.6 hrs.
6-26-19	Prepare documents in response to subpoena; meeting with client; consultation with insurance company attorney; exchange of emails. Re: Fehl	3.0 hrs.
	TOTAL HOURS	45.8 hrs.
	45.8 HOURS @ \$185.00 PER HOUR	\$8,473.00
	Expenses (See attached)	\$-----
	TOTAL AMOUNT DUE	\$8,473.00

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October 25, 2019

Via Electronic Mail

Hector Olmo, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
July, 2019

Dear Mr. Olmo:

Enclosed please find my statement of services rendered for July, 2019.

Kindly process for payment at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,


David F. Corrigan

The Corrigan Law Firm

Counselors At Law
54-B West Front Street
Keyport, NJ 07735

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Billing Statement**for services rendered:, 2019****TO: Borough of Wallington**

7-1-19	Review inquiry re: outside employment; review Borough documents; confer with client; render legal opinion. Re: Baginski	2.8 hrs.
7-3-19	Review Wallington Police Department Rules and Regulations on harassment and confidentiality Re: Police Harassment Investigation	.9 hrs.
7-3-19	Review Wallington Code regarding Mayor and Council authority over Police Department and disciplinary procedures Re: Police Harassment Investigation	1.2 hrs.
7-3-19	Review <u>Libertarians for Transparent Gov't v. N.J. State Police</u> , No. A-5675-16T2, 2019 N.J. Super. Unpub. LEXIS 1156 (App. Div. May 20, 2019) Re: Police Harassment Investigation	.7 hrs.
7-3-19	Review <u>Jones v. Paulsboro Police Dep't</u> , 2012 N.J. Super. Unpub. LEXIS 234, 2012 WL 140256 Re: Police Harassment Investigation	.5 hrs.
7-3-19	Review <u>Div. of State Police v. Flaherty</u> , No. A-0257-07T2, 2008 N.J. Super. Unpub. LEXIS 169 (App. Div. Dec. 22, 2008) Re: Police Harassment Investigation	.7 hrs.
7-3-19	Review <u>Ganzweig v. Twp. of Lakewood</u> , 2013 N.J. Super. Unpub. LEXIS 2537 Re: Police Harassment Investigation	.6 hrs.
7-3-19	Review <u>N.J.A.C. 4A:2-2.3</u> and case notes Re: Police Harassment Investigation	.8 hrs.

7-5-19	Review Attorney General Guidelines/policy and procedures of internal affairs regarding harassment and confidentiality Re: Police Harassment Investigation	1.4 hrs.
7-5-19	Review N.J.A.C. 4A:2-3.1 and case notes Re: Police Harassment Investigation	.7 hrs
7-5-19	Review N.J.S.A. 40A:14-147 and case notes Re: Police Harassment Investigation	.8 hrs.
7-5-19	Review <u>Mooney v. City of Atl. City</u> , No. A-2993-13T4, 2016 N.J. Super. Unpub. LEXIS 1863 (App. Div. Aug. 9, 2016) Re: Police Harassment Investigation	.8 hrs.
7-5-19	Draft legal memo regarding confidentiality of IA reports and the right to access them. Re: Police Harassment Investigation	1.4 hrs.
7-8-19	Commence draft investigative report. Re: Police Harassment Investigation	6.5 hrs.
7-9-19	Continue Draft of Investigative report. Re: Police Harassment Investigation	7.5 hrs.
7-10-19	Conclude draft of investigative report. Re: Police Harassment Investigation	7.0 hrs.
7-11-19	Review, revise and edit draft investigative report. Re: Police Harassment Investigation	5.2 hrs.
7-22-19	Review record; review request to produce; commence compiling documents in response to request to produce. Re: Baginski	6.5 hrs.
7-23-19	Continue preparing response to request to produce. Re: Baginski	8.0 hrs.
7-24-19	Prepare deposition notice for Baginski; review email from Custodian, draft subpoena <u>duces tecum</u> for custodian of records; draft subpoena for Kurt Cassidy Re: Baginski	1.4 hrs.
7-25-19	Receipt, review and analysis of response to request for admissions. Re: Baginski	1.5 hrs.

7-25-19	Amend Cassidy and custodian of records subpoenas Re: Baginski	.5 hrs.
7-25-19	Review and revise documents to be sent to Tandy regarding depositions and subpoenas Re: Baginski	.4 hrs.
7-25-19	Draft response to requests to produce documents Re: Baginski	1.4 hrs.
	TOTAL HOURS	59.2
	59.2 HOURS @ \$185.00 PER HOUR	\$10,952.00
	Expenses (See attached)	\$-----
	TOTAL AMOUNT DUE	\$10,952.00

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October 25, 2019

Via Electronic Mail

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Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
August, 2019

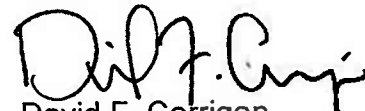
Dear Mr. Olmo:

Enclosed please find my statement of services rendered for August, 2019.

Kindly process for payment at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,


David F. Corrigan

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Billing Statement

for services rendered: August, 2019.

TO: Borough of Wallington

8-1-19	Review and respond to email re: attendance at upcoming deposition; review court rules. Re: Baginski	1.0 hrs.
8-12-19	Office conference; draft letter to client detailing the changes that were made to the WEA Agreement; fix formatting of WEA Contract; print for review Re: WEA Negotiations	2.1 hrs.
8-13-19	Review, revise and editing of contract. Re: WEA Negotiations	.5 hrs.
8-14-19	Attendance at client meeting; study OPRA files; arrange for transportation to office; draft memo to former Township Attorney regarding testimony. Re: Baginski	4.7 hrs.
8-14-19	Draft letter to adversary re: scheduling upcoming depositions/discovery. Re: Baginski	1.0 hrs.
8-14-19	Draft letter to Cassidy lawyer re: scheduling depositions; conference with lawyer re: scheduling. Re: Baginski	1.5 hrs.
8-15-19	Draft letter to court regarding adversary's failure to provide answers to interrogatories and requests for production and requesting conference call. Re: Baginski	1.3 hrs.
8-16-19	Contact Office of the Comptroller attendance at scheduled deposition; confer with Comptroller's office advising that he is represented by AGs office and providing name and number of DAG; provide firm with update; received adjournment letter from Cassidy's Atty, advised firm. Re: Baginski	.8 hrs.

8-16-19	Receipt and review of transcripts of Prosecutor interviews of Baginski and Cassidy. Study and annotate same; reread. Re: Baginski	5.5 hrs.
8-16-19	Draft letter to expert witness re: testimony. Re: Baginski	.8 hrs.
8-17-19	Prepare email to adversary re: outstanding discovery; review response. Re: Baginski	.5 hrs.
8-18-19	Confer with client; revise WEA contract pursuant to client's request. Re: WEA Agreement	2.0 hrs.
8-19-19	Confer with Cassidy lawyer and draft letter regarding same; draft letter to adversary re: depositions. Re: Baginski	1.1 hrs.
8-19-19	Prepare additional discovery based on new developments. Re: Baginski	4.5 hrs.
8-19-19	Receipt and review of letter from court; outline response; draft letter to Borough Attorney. Re: Baginski	1.0 hrs.
8-23-19	Respond to Borough Attorney inquiry re: jurisdictional issues and avenue to appeal. Re: Baginski	.5 hrs.
8-23-19	Review motion to quash filed by State; outline response; commence legal research. Re: Baginski	5.0 hrs.
8-25-19	Interview witness; draft letter re: depositions. Re: Baginski	1.5 hrs.
8-25-19	Commence response to motion to quash; draft memo to Borough Attorney. Re: Baginski	6.7 hrs.
8-25-19	Review and respond to inquiry from Borough Attorney to mitigation issue and BA status. Re: Baginski	1.0 hrs.

8-26-19	Conclude response to motion to quash; review, revise and editing of same; confer with adversary; draft memo to court. Re: Baginski	5.5 hrs,
8-26-19	Prepare status report to Judge Scollo. Re: Baginski	2.0 hrs.
8-26-19	Draft letter to Cassidy's attorney; re: deposition. Re: Baginski	.2 hrs.
8-26-19	Review and respond to request for IA legal opinion. Re: Baginski	.5 hrs.
8-28-19	Prepare response to inquiry from Borough Attorney re: legal opinion. Re: Legal Opinion	.5 hrs.
8-29-19	Review letter from adversary; draft letters to client re: alleged settlement offer; prepare for and attendance at court conference; review court order; draft letter to client regarding developments. Re: Baginski	5.6 hrs.
	TOTAL HOURS	57.3 hrs.
	57.3 HOURS @ \$185.00 PER HOUR	\$10,600.50
	Expenses (See attached)	\$-----
	TOTAL AMOUNT DUE	\$10,600.50

Please make checks payable to David F. Corrigan, Esq.

The Corrigan Law Firm

Counselors At Law
54-B West Front Street
Keyport, NJ 07735

PH.: (732) 888-3868
FAX: (732) 888-9055

Billing Statement**for services rendered: March, 2019****TO: Borough of Wallington**

3-1-19	Receipt and review employee handbook. Re: Police Harassment Investigation	1.5 hrs.
3-6-19	Prepare for and attendance at meeting to discuss negotiations with unions. Re: Negotiations	2.5 hrs.
3-6-19	Receipt and review of notice of filing from O.A.L. Re: Baginski Tenure Charges	.2 hrs.
3-8-19	Conferences with client re: insurance proposal. Re: Negotiations	.5 hrs.
3-13-19	Prepare for and meeting with client to discuss Borough insurance proposal. Re: Negotiations	3.5 hrs.
3-13-19	Prepare for and attendance at interviews of Complainant and witnesses; review documents furnished by witnesses. Re: Police Harassment Investigation	4.5 hrs.
3-15-19	Exchange of emails; prepare for and attendance at conference before Judge Cookson. Re: Baginski Tenure Charges	1.2 hrs.
3-16-19	Confer with client re: court conference. Re: Baginski Tenure Charges	.3 hrs.
3-16-19	Commence legal research re: stay issues; review previous briefs concerning this issue. Re: Baginski Tenure Charges	2.5 hrs.
3-21-19	Prepare for and meeting with client. Re: Baginski Tenure Charges	1.5 hrs.

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3-25-19	Review emails and correspondence with Township Attorney; prepare for and attendance at conference call; review draft subpoena to BCPD. Re: Baginski Tenure Charges	1.5 hrs.
	TOTAL HOURS	19.7 hrs.
	19.7 HOURS @ \$185.00 PER HOUR	\$3,644.50
	Expenses (See attached)	\$-----
	TOTAL AMOUNT DUE	\$3,644.50

Please make checks payable to David F. Corrigan, Esq.

The Corrigan Law Firm
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Keyport, New Jersey 07735
732-888-3868
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Counsellorcorrigan@msn.com

David F. Corrigan, Esq.+
Frank J. Dyevoich, Jr., Esq.

-
- + Certified by the Supreme Court of New Jersey
As a Civil Trial Attorney
 - * Admitted in New Jersey and New York

April 9, 2019

Via Electronic Mail

Hector Olmo, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
March, 2019

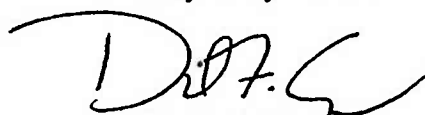
Dear Mr. Olmo:

Enclosed please find my statement of services rendered for March, 2019.

Kindly process for payment at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,



David F. Corrigan

The Corrigan Law Firm

Counselors At Law
54-B West Front Street
Keyport, NJ 07735

PH.: (732) 888-3868
FAX: (732) 888-9055

Billing Statement

for services rendered: December, 2018

TO: Borough of Wallington

12-9-18	Study record; commence preparing/revising disciplinary (tenure) charges. Re: Baginski	6.2 hrs.
12-10-18	Continue preparing discovery (tenure) charges; prepare for meeting; review and edit charges in light of client comments). Re: Baginski	5.2 hrs.
12-10-18	Receipt and review of information from client supporting tenure charges. Re: Baginski	.5 hrs.
12-11-18	Prepare for (and conference calls) and attendance at Council meeting; review OPRA, sup court complaint, and related documents from client; dispute with administrator; workplace violence allegations; render opinion concerning filing complaint against Baginski to recover money. Re: Baginski	7.5 hrs.
12-16-18	Review and respond to client's request for information. Re: Baginski	.5 hrs.
12-16-18	Review emails; confer with client. Re: Baginski	.5 hrs.
12-19-18	Conferences with client; prepare for and meeting with I.A. investigators; review and study documents provided by I.A. investigators. Re: Police Sex Harassment Investigation	4.7 hrs.
12-20-18	Calls with client concerning Council meeting and response to same. Re: Baginski	1.2 hrs.

12-21-18	Conference call with client. Re: Baginski	1.5 hrs.
12-22-18	Conference call with client. Re: Baginski	1.2 hrs.
12-22-18	Review and analysis of PBA letter; conference with client. Re: PBA	1.3 hrs.
12-27-18	Exchange of emails with PBA attorney re: meeting; draft memo to client re: need for information. Re: PBA	.5 hrs.
12-28-18	Review file; outline information required to respond to Council's request. Re: Baginski	2.8 hrs.
	TOTAL HOURS	33.6 hrs.
	33.6 HOURS @ \$185.00 PER HOUR	\$6,216.00
	Expenses (copying fee to council meeting)	\$42.00
	TOTAL AMOUNT DUE	\$6,258.00

Please make checks payable to David F. Corrigan, Esq.

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732-888-3868
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Counsellorcorrigan@msn.com

David F. Corrigan, Esq.+

+ Certified by the Supreme Court of New Jersey
As a Civil Trial Attorney

January 3, 2019

Via Electronic Mail

Victor M. Polce, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
December, 2018

Dear Mr. Polce:

Enclosed please find my statement of services rendered for December, 2018.

Kindly process for payment at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,


David F. Corrigan

The Corrigan Law Firm

Counselors At Law
54-B West Front Street
Keyport, NJ 07735

PH.: (732) 888-3868
FAX: (732) 888-9055

Billing Statement

for services rendered: November, 2018

TO: Borough of Wallington

11-2-18	Review emails re: cell phone reimbursement; conferences with client regarding same. Re: Baginski	.8 hrs.
11-10-18	Review and analyze outline from client re: potential tenure charges. Re: Baginski	1.0 hrs.
	TOTAL HOURS	1.8 hrs.
	1.8 HOURS @ \$185.00 PER HOUR	\$333.00
	Expenses (See attached)	\$-----
	TOTAL AMOUNT DUE	\$333.00

Please make checks payable to David F. Corrigan, Esq.

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Keyport, New Jersey 07735
732-888-3868
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Counsellorcorrigan@msn.com

David F. Corrigan, Esq.+

+ Certified by the Supreme Court of New Jersey
As a Civil Trial Attorney

January 3, 2019

Via Electronic Mail

Victor M. Polce, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
November, 2018

Dear Mr. Polce:

Enclosed please find my statement of services rendered for November, 2018.

Kindly process for payment at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,



David F. Corrigan

The Corrigan Law Firm
54-B West Front Street
Keyport, New Jersey 07735
732-888-3868
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Counselorcorrigan@msn.com

David F. Corrigan, Esq.+
Frank J. Dyevoich, Jr., Esq.

+ Certified by the Supreme Court of New Jersey
As a Civil Trial Attorney
* Admitted in New Jersey and New York

April 9, 2019

Via Electronic Mail

Hector Olmo, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
February, 2019

Dear Mr. Olmo:

Enclosed please find my statement of services rendered for February, 2019.

In addition, my January, 2019 invoice that was submitted on February 12, 2019, still has not been paid. For your ready reference, I enclose another copy of this invoice.

Would you kindly process for payment both invoices at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,



David F. Corrigan

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01-2010-20-1552-068

The Corrigan Law Firm

Counselors At Law
54-B West Front Street
Keyport, NJ 07735

PH.: (732) 888-3868
FAX: (732) 888-9055

Billing Statement**for services rendered: February, 2019****TO: Borough of Wallington**

2-3-19	Review file; review, revise and edit tenure charges; conferences with client. Re: Baginski Tenure Charges	4.5 hrs.
2-4-19	Review Township Clerk documents; meeting with client; prepare tenure/suspension with pay resolution; commence preparing document for client re: supporting evidence for charges. Re: Baginski Tenure Charges	7.5 hrs.
2-5-19	Finalize tenure charges and supporting documents; conferences with client; review documents supplied by client; prepare for and attendance at Council meeting. Re: Baginski Tenure Charges	9.5 hrs.
2-6-19	Filing of tenure charges with DLGS; conferences with client leave with pay status. Re: Baginski Tenure Charges	1.0 hrs.
2-5-19	Research law concerning alleged conflict of interest claim; draft letter to Baginski attorney re: alleged conflict of interest claim. Re: Baginski Tenure Charges	1.5 hrs.
2-7-19	Prepare for and attendance at complainant interview. Re: Harassment Investigation	3.5 hrs.
2-11-19	Review and outline response to Tandy letter. Re: Baginski Tenure Charges	1.0 hrs.
2-12-19	Receipt and review rules and regulations; sexual harassment policy. Re: Harassment Investigation	2.0 hrs.
2-18-19	Receipt and review of correspondence from DLGS; draft letter to client. Re: Baginski Tenure Charges	.5 hrs.

	TOTAL HOURS	31.0 hrs.
	31.0 HOURS @ \$185.00 PER HOUR	\$5,735.00
	Past Due Amount	\$4,273.50
	TOTAL AMOUNT DUE	\$10,008.50

Please make checks payable to David F. Corrigan, Esq.

The Corrigan Law Firm
54-B West Front Street
Keyport, New Jersey 07735
732-888-3868
732-888-9055 (Fax)
Counselorcorrigan@msn.com

David F. Corrigan, Esq.+

+ Certified by the Supreme Court of New Jersey
As a Civil Trial Attorney

February 12, 2019

Via Electronic Mail

Jane Fontana, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
January, 2019

Dear Ms. Fontana:

Enclosed please find my statement of services rendered for January, 2019.

Kindly process for payment at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,

/s/ David F. Corrigan

David F. Corrigan

The Corrigan Law Firm

Counselors At Law
54-B West Front Street
Keyport, NJ 07735

PH.: (732) 888-3868
FAX: (732) 888-9055

Billing Statement

for services rendered: January, 2019

TO: Borough of Wallington

1-5-19	Confer with acting administrator re: pending matters. Re: Pending Matters	.5 hrs.
1-5-19	Confer with client concerning reorganization and pending matters. Re: Reorganization	1.0 hrs.
1-7-19	Confer with administrator/client re: pending matters. Re: Pending Matters	.5 hrs.
1-11-19		1.0 hrs.
1-14-19	Prepare for and attendance at Police committee meeting to discuss negotiations. Re: PBA Negotiations	3.0 hrs.
1-15-19	Confer with client; review OPRA request and response. Re: Pending Matters	.5 hrs.
1-20-19		.8 hrs.
1-21-19	Review PBA contract; prepare memo to client re: analysis of contract; analysis of negotiations issues. Re: PBA Negotiations	2.5 hrs.
1-22-19	Confer with client. Re: Pending Matters	.5 hrs.
1-23-19	Confer with client re: pending matters. Re: Pending Matters	.5 hrs.
1-24-19	Review email and PBA proposals; analysis of same; prepare memo to client. Re: PBA Negotiations	2.5 hrs.

1-24-19	Conferences re: tenure charges; confer with client and Borough Attorney. Re: Baginski Tenure Charges	2.5 hrs.
1-28-19	Prepare <u>Rice</u> notice. Re: Baginski Tenure Charges	.5 hrs.
1-28-19	Prepare letter concerning alleged conflict of interest; review response; draft follow-up letter. Re: Baginski Tenure Charges	1.1 hrs.
1-29-19	Receipt, review and initial analysis of OPRA log. Re: Baginski Tenure Charges	1.5 hrs.
1-30-19	Receipt and review of <u>Rice</u> notice response; confer with client regarding same. Re: Baginski Tenure Charges	.5 hrs.
1-30-19	Draft letter requesting certain information from client; review response; confer with client. Re: Baginski Tenure Charges	2.5 hrs.
1-30-19	Draft letters to Borough Attorney and state agencies seeking relevant information. Re: Baginski Tenure Charges	1.2 hrs.
	TOTAL HOURS	23.1 hrs.
	23.1 HOURS @ \$185.00 PER HOUR	\$4,273.50
	Expenses (See attached)	\$-----
	TOTAL AMOUNT DUE	\$4,273.50

Please make checks payable to David F. Corrigan, Esq.

**THE CORRIGAN LAW FIRM
54-B WEST FRONT STREET
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732-888-3868
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COUNSELLORCORRIGAN@MSN.COM**

**DAVID F. CORRIGAN, ESQ.+
FRANK J. DYEVOICH, JR., ESQ.**

**+ CERTIFIED BY THE SUPREME COURT OF NEW JERSEY
AS A CIVIL TRIAL ATTORNEY
* ADMITTED IN NEW JERSEY AND NEW YORK**

January 31, 2020

Via Electronic Mail

Hector Olmo, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
October, 2019

Dear Mr. Olmo:

Enclosed please find my statement of services rendered for October, 2019.

Kindly process for payment at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,


David F. Corrigan

The Corrigan Law Firm

Counselors At Law
54-B West Front Street
Keyport, NJ 07735

PH.: (732) 888-3868
FAX: (732) 888-9055

BILLING STATEMENT**FOR SERVICES RENDERED: OCTOBER, 2019**

TO: Borough of Wallington

10-1-19	Review Baginski's status report and request for court intervention re: discovery; commence outline in response; review court rules re: discovery. Re: Baginski Tenure Charges	4.6 hrs.
10-1-19	Review and respond to inquiry from court; review. Re: Baginski Tenure Charges	.5 hrs.
10-2-19	Research rules for deposition in Office of Administrative Law hearings; review <u>N.J.A.C. 1:1-10.1 et. seq.</u> ; <u>N.J.A.C. 1:1-10.2</u> (Discovery by notice or motion; depositions; physical and mental examinations) for rules regarding depositions; research case law on deposing high ranking public officials; review <u>United States v. Morgan</u> , 313 U.S. 409, 422 (1941); <u>Simplex Time Recorder Co. v. Sec'y of Labor</u> , 766 F.2d 575, 586 (D.C. Cir. 1985); <u>United States v. Sensient Colors Inc.</u> , 649 F. Supp. 2d 309, 316 (D.N.J. 2009); <u>Bogan v. City of Boston</u> , 489 F.3d 417, 423 (1st Cir. 2007); <u>Buono v. City of Newark</u> , 249 F.R.D. 469 (D.N.J. 2008); <u>Hankins v. City of Phila.</u> , CIVIL ACTION NO. 95-1449, 1996 U.S. Dist. LEXIS 13314 (E.D. Pa. Sep. 11, 1996); <u>Marisol A. by Forbes v. Giuliani</u> , 95 Civ. 10533 (RJW), 1998 U.S. Dist. LEXIS 3719, at *6-7 (S.D.N.Y. Mar. 23, 1998); Consumer Affairs, Division of v. Acme Markets, Inc., 3 N.J.A.R. 210 (1981) and <u>Hyland v. Smollok</u> , 137 N.J. Super. 456, 460 (App. Div. 1975); draft memo regarding rules of OAL depositions and case law supporting the rule that high ranking officials are not to be deposed generally. Re: Baginski Tenure Charges	6.7 hrs.
10-2-19	Review file; prepare status report to court. Re: Baginski Tenure Charges	2.5 hrs.

10-3-19	Conferences and exchange of emails re: Baginski deposition. Re: Baginski Tenure Charges	.5 hrs.
10-3-19	Review and respond to adversary adjournment of deposition; confer with client; Borough Attorney. Re: Baginski Tenure Charges	.5 hrs.
10-7-19	Draft memo to witness Polce; confer with Polce. Re: Baginski Tenure Charges	.5 hrs.
10-7-19	Legal research; review transcript; prepare motion for protective order. Re: Baginski Tenure Charges	8.5 hrs.
10-8-19	Confer with co-counsels in federal suit. Re: Baginski Tenure Charges	1.5 hrs.
10-8-19	Prepare memo to co-counsel re: recent developments. Re: Baginski Tenure Charges	1.5 hrs.
10-9-19	Review and respond to deposition cancellation; confer with client. Re: Baginski Tenure Charges	.5 hrs.
10-9-19	Conferences with client; draft letter to client; prepare memo to client re: scheduling of deposition for Olkowski. Re: Baginski Tenure Charges	.5 hrs.
10-10-19	Review complaint – tenure charges. Research standard of review on summary decision. Review N.J.A.C. 1:1-12.5, <u>Contini v. Bd. of Educ. of Newark</u> , 286 N.J. Super. 106 (App. Div. 1995), <u>Twp. of Middle Bd. of Educ. v. N.J. State Dept. of Educ.</u> , 1998 N.J. AGEN LEXIS 44, <u>Bridgewater-Raritan Educ. Ass'n v. Bd. of Educ. of Bridgewater-Raritan Sch. Dist.</u> , 221 N.J. 349 (2015). Draft memorandum of law. Re: Baginski Tenure Charges	7.0 hrs.
10-11-19	Review Municipal Clerk statute - <u>N.J.S.A. § 40A:9-133 et seq.</u> , Search and review numerous Civil Service and Administrative Law cases. Analyze decisions to argue appropriate penalty is removal; draft memorandum of law in support of summary decision motion. Re: Baginski Tenure Charges	6.5 hrs.

10-13-19	Legal research; review deposition; commence preparing for summary decision motion. Re: Baginski Tenure Charges	7.0 hrs.
10-14-19	Continue preparation of summary judgment decision brief. Re: Baginski Tenure Charges	6.7 hrs.
10-15-19	Conclude preparation of summary judgment motion; review, revise and editing of same. Re: Baginski Tenure Charges	6.5 hrs.
10-14-19	Confer with witness. Re: Baginski Tenure Charges	.5 hrs.
10-16-19	Prepare memo to client to prepare for federal court; depositions; exchange of emails. Re: Baginski Tenure Charges	1.5 hrs.
10-18-19	Prepare and draft subpoenas for witnesses. Re: Baginski Tenure Charges	.5 hrs.
10-21-19	Draft emails to adversary and court re: scheduling hearing. Re: Baginski Tenure Charges	1.0 hrs.
10-24-19	Draft email to court re: scheduling. Re: Baginski Tenure Charges	.2 hrs.
10-24-19	Exchange emails and confer with Borough Attorney. Re: Police Disciplinary Matter	.5 hrs.
10-25-19	Prepare for and attendance at conference call with Court. Re: Baginski Tenure Charges	2.5 hrs.
10-31-19	Confer with I.A. officer; review correspondence from I.A. officer; review <u>N.J.A.C. §4A:2-2</u> , and Wallington Police Department rules and regulation; prepare Preliminary Notice of Disciplinary Action; review, revise and edit same. Re: Police Disciplinary Matter	4.5 hrs.
10-31-19	Re-review correspondence from i.a. officer; review <u>N.J.A.C. § 4A:2-2</u> , and Wallington Police Department; rules and regulations; edit preliminary Notice of Disciplinary Action. Re: Police Disciplinary Matter	2.5 hrs.
	TOTAL HOURS	75.7

	75.7 HOURS @ \$150.00 PER HOUR	\$11,355.00
	Expenses (Kurt Cassidy)	\$865.00
	TOTAL AMOUNT DUE	\$12,220.00

Please make checks payable to David F. Corrigan, Esq.

**THE CORRIGAN LAW FIRM
54-B WEST FRONT STREET
KEYPORT, NEW JERSEY 07735
732-888-3868
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COUNSELLORCORRIGAN@MSN.COM**

**DAVID F. CORRIGAN, ESQ.+
FRANK J. DYEVOICH, JR., ESQ.**

**+ CERTIFIED BY THE SUPREME COURT OF NEW JERSEY
AS A CIVIL TRIAL ATTORNEY
* ADMITTED IN NEW JERSEY AND NEW YORK**

February 18, 2020

Via Electronic Mail

Hector Olmo, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
November, 2019

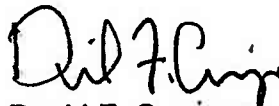
Dear Mr. Olmo:

Enclosed please find my statement of services rendered for November, 2019.

Kindly process for payment at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,


David F. Corrigan

The Corrigan Law Firm

Counselors At Law
54-B West Front Street
Keyport, NJ 07735

PH.: (732) 888-3868

FAX: (732) 888-9055

BILLING STATEMENT**FOR SERVICES RENDERED:, 2019**

TO: Borough of Wallington

11-4-19		3.1 hrs.
11-8-19	Confer with client; research law affecting salary increases of certain municipal officers; review <u>N.J.S.A. § 40A:9-165 et seq.</u> Draft memo of law. Re: Clerk Salary Increase	4.0 hrs.
11-8-19	Receipt and review/analysis of ALJ interim decision; confer with client; draft letter to client Re: Baginski Tenure	1.5 hrs.
11-11-19	Draft legal opinion. Re: Clerk Salary Increase	3.5 hrs.
11-12-19	Draft letter to court re: clarification of time deadlines. Re: Baginski Tenure	.5 hrs.
11-13-19	Receipt of deposition notice; confer with client and co-counsel; preliminary review of law; outline response. Re: Baginski Tenure	2.5 hrs.
11-13-19	Receipt and review of court letter clarifying earlier letter. Re: Baginski Tenure	.5 hrs.
11-14-19	Receipt and review of GRC OPRA decision confer with client. Re: Baginski Tenure	.4 hrs.
11-14-19	Prepare for and attendance at Council Meeting. Re: Council Meeting	3.0 hrs.
11-14-19	Prepare memo to co-counsel. Re: Baginski Tenure	1.5 hrs.

11-14-19	Prepare memo to client re: ALJ decision on subpoena of State's records re: unauthorized overtime. Re: Baginski Tenure	1.5 hrs.
11-15-19	Receipt and review of adversary's opposition to motion for summary decision; outline response. Re: Baginski Tenure	2.5 hrs.
11-18-19	Research deadlines for State law motions for reconsideration. Review N.J. Court <u>Rule 1:7-4(b)</u> , <u>Rule 4:42-2</u> . Draft memorandum of law. Re: Baginski Tenure	1.5 hrs.
11-18-19	Research issue of interlocutory appeals under OAL rules; re-review <u>N.J.A.C. § 1:1</u> et seq; edit and revise memorandum of law. Re: Baginski Tenure	2.1 hrs.
11-18-19	Legal research; review OAL rules; prepare draft interlocutory appeal to DLGS; draft letter to ALJ regarding same; review, revise and editing same. Re: Baginski Tenure	2.5 hrs.
11-19-19	Review files, including motion for summary decision. Re-review tenure charges. Research issue of relevance of misconduct in capacity other than within specific job title. Outline memorandum of law re: reply brief. Re: Baginski Tenure	3.5 hrs.
11-19-19	Confer with and review letter from co-counsel re: depositions and response from adversary. Re: Baginski Tenure	.2 hrs.
11-20-19	Receipt and review letter from adversary re: scheduled depositions. Re: Baginski Tenure	.2 hrs.
11-20-19	Prepare for and meeting with co-counsel to prepare response to subpoena. Re: Baginski Federal Suit	1.5 hrs.
11-20-19	Re-review files. Review <u>Karins v. Atlantic City</u> , 152 N.J. 532 (1998), <u>In re Yaccarino</u> , 117 N.J. 175 (1989), <u>In the Matter of Matthew Green. Dept. of Human Servs.</u> , 2006 N.J. AGEN LEXIS 632. Draft memorandum of law re: reply brief. Re: Baginski	5.5 hrs.
11-20-19	Prepare for and attendance at court conference. Re: Baginski	1.0 hrs.

11-21-19	Draft letter to court re: reply brief. Re: Baginski Tenure	.5 hrs.
11-21-19	Re-review <u>Karins v. Atlantic City</u> , 152 N.J. 532 (1998), <u>In re Yaccarino</u> , 117 N.J. 175 (1989), <u>In the Matter of Matthew Green</u> , Dept. of Human Servs., 2006 N.J. AGEN LEXIS 632. Review <u>Pietrunti v. Bd. of Educ.</u> , 128 N.J. Super. 149 (App. Div. 1974) Edit and revise memorandum of law re: reply brief. Re: Baginski Tenure	2.5 hrs
11-21-19	Research issue of obtaining summary judgment notwithstanding incomplete discovery. Review Fed. R. Civ. P. 56, N.J. Court Rule 4:46, <u>Cousin v. Harold</u> , 238 F. Supp. 2d 357 (D. Mass. 2002), <u>Johnke v. Espinal-Quiroz</u> , No. 14-cv-6992, U.S. Dist. LEXIS 114087, (N.D. Ill. July 9, 2018). Draft memorandum of law. Re: Baginski Tenure	3.2 hrs.
11-21-19	Court conference. Re: Baginski	1.0 hrs.
11-22-19	Review, revise and final editing of reply brief. Re: Baginski Tenure	4.5 hrs.
11-22-19	Review co-counsel letter re: deps; conference regarding same. Re: Baginski Tenure	.2 hrs.
11-22-19	Conferences with client and adversary re: scheduling depositions. Re: Baginski Tenure	1.5 hrs.
11-26-19	Draft letter to other counsel rescheduling depositions in accordance with council member availability and court order. Re: Baginski	.8 hrs.
11-26-19	Conferences and draft letter to adversary re: scheduling depositions. Re: Baginski	.6 hrs.
11-26-19	Draft status report to court. Re: Baginski	1.0 hrs.
	TOTAL HOURS	58.3
	58.3 HOURS @ \$150.00 PER HOUR	\$8,745.00
	Expenses (See attached)	\$-----
	TOTAL AMOUNT DUE	\$8,745.00

Please make checks payable to David F. Corrigan, Esq.

THE CORRIGAN LAW FIRM
54-B WEST FRONT STREET
KEYPORT, NEW JERSEY 07735
732-888-3868
732-888-9055 (FAX)
COUNSELLORCORRIGAN@MSN.COM

DAVID F. CORRIGAN, ESQ.+
FRANK J. DYEVOICH, JR., ESQ.

+ CERTIFIED BY THE SUPREME COURT OF NEW JERSEY
AS A CIVIL TRIAL ATTORNEY
* ADMITTED IN NEW JERSEY AND NEW YORK

January 22, 2020

Via Electronic Mail

Hector Olmo, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
September, 2019

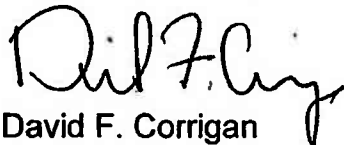
Dear Mr. Olmo:

Enclosed please find my statement of services rendered for September, 2019.

Kindly process for payment at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,


David F. Corrigan

The Corrigan Law Firm

Counselors At Law
54-B West Front Street
Keyport, NJ 07735

PH.: (732) 888-3868
FAX: (732) 888-9055

BILLING STATEMENT**FOR SERVICES RENDERED: SEPTEMBER, 2019**

TO: Borough of Wallington

9-1-19	Review and respond to inquiry from co-counsel. Re: Cassidy Deposition	.5 hrs.
9-1-19	Draft crossing guard and WEA contracts; confer with client; exchange emails. Re: Collective Bargaining Agreement	3.5 hrs.
9-2-19	Prepare for Baginski deposition. Re: Baginski	7.0 hrs.
9-3-19	Review and organize documents to prepare for deposition of Baginski. Re: Baginski	4.8 hrs.
9-3-19	Review OPRA requests; draft letter to Tandy enclosing additional discovery; draft letter to court. Re: Baginski	3.5 hrs.
9-3-19	Exchange of emails re: scheduled depositions. Re: Baginski	.5 hrs.
9-3-19	Draft letter to adversary re: discovery. Re: Baginski	.5 hrs.
9-3-19	Draft email to client re: witnesses. Re: Baginski	.5 hrs.
9-3-19	Review Reply Brief to opposition to motion to quash subpoena from Jakai Jackson Re: Baginski Tenure Charges	1.1 hrs.
9-4-19	Prepare for and attendance at Baginski deposition. Re: Baginski	7.5 hrs.
9-4-19	Review court order re: scheduling of depositions. Re: Baginski	.5 hrs.
9-9-19	Review and respond to email re: contract. Re: Crossing Guard Contract	.5 hrs.

9-11-19	Exchange of emails re: depositions and demanding that the case be dismissed. Re: Baginski	.5 hrs.
9-11-19	Draft letter to adversary re: Cassidy deposition; exchange of emails. Re: Baginski	.5 hrs.
9-12-19	Conferences with client and exchange of emails re: protective order application. Re: Baginski	.8 hrs.
9-16-19	Draft memo to client re: upcoming depositions. Re: Baginski	.5 hrs.
9-16-19	Conferences with Borough attorney re: depositions; exchange of emails. Re: Baginski	.5 hrs.
9-16-19	Review Cassidy 4-19-18 interview before Prosecutor; exchange of emails with client. Re: Baginski	1.8 hrs.
9-18-19	Prepare for Cassidy deposition. Re: Baginski	6.0 hrs.
9-18-19	Exchange of emails with adversary re: depositions. Re: Baginski	.5 hrs.
9-19-19	Prepare for and attendance at Cassidy deposition. Re: Baginski	6.5 hrs.
9-20-19	Review OPRA request for transcript; legal research; prepare response; exchange of emails. Re: Baginski	.8 hrs.
9-23-19	Prepare witnesses for depositions. Re: Baginski	3.0 hrs.
9-24-19	Prepare for and attendance at Androwis deposition. Re: Baginski	5.5 hrs.
9-24-19	Review and confirm all exhibits are correct and in order; use ECF database to locate and print federal case complaint for firm review; Re: Baginski	.6 hrs.
9-25-19	Prepare for and attendance at court status/settlement conference. Re: Baginski	4.5 hrs.

9-26-19	Preparation for Rachelski deposition.. Re: Baginski	2.0 hrs.
9-29-19	Review and respond to inquiry from client re: tenure changes. Re: Baginski	.5 hrs.
9-30-19	Attendance at Rachelski deposition; conferences with client. Re: Baginski	3.0 hrs.
	TOTAL HOURS	67.9
	67.9 HOURS @ \$150.00 PER HOUR	\$10,185.00
	Expenses (Guaranteed Subpoena and Court Reporter)	\$1280.29
	TOTAL AMOUNT DUE	\$11,465.29

Please make checks payable to David F. Corrigan, Esq.

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**DAVID F. CORRIGAN, ESQ.+
FRANK J. DYEVOICH, JR., ESQ.**

**+ CERTIFIED BY THE SUPREME COURT OF NEW JERSEY
AS A CIVIL TRIAL ATTORNEY
* ADMITTED IN NEW JERSEY AND NEW YORK**

February 18, 2020

Via Electronic Mail

Hector Olmo, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
December, 2019

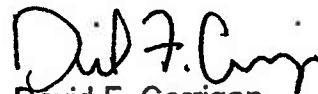
Dear Mr. Olmo:

Enclosed please find my statement of services rendered for December, 2019.

Kindly process for payment at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,


David F. Corrigan

The Corrigan Law Firm

Counselors At Law
54-B West Front Street
Keyport, NJ 07735

PH.: (732) 888-3868
FAX: (732) 888-9055

BILLING STATEMENT

FOR SERVICES RENDERED:, 2019

TO: Borough of Wallington

12-2-19	Review Order by Judge Scollo denying protective order. Research law regarding Attorney-Client privilege. Review and shepardize <u>N.J.S.A. § 2A:84A-20(1)</u> ; <u>N.J.R.E. 504(1)</u> . Review <u>United States v. Kovel</u> , 296 F.2d 918 (1961). Re: Baginski Tenure	2.2 hrs.
12-4-19	Review and respond to inquiry from client re: discipline of clerical employee. Re: Clerical Employee Discipline	.5 hrs.
12-5-19	Draft letter to adversary and court regarding interim decision. Re: Baginski Tenure	1.2 hrs.
12-5-19	Review deposition transcript of Khaldoun Androis. Begin preparing motion for reconsideration of decision regarding attorney-client privilege. Re: Baginski Tenure	3.5 hrs.
12-6-19	Re-review case file, including Judge's Order, deposition transcripts, and letters from adversary. Research case law concerning attorney acting in strict professional capacity in regard to the attorney-client privilege. Re-review <u>In re Grand Jury Subpoenas Duces Tecum Served by Sussex Cty., United Jersey Bank v. Wolosoff</u> , 241 N.J. Super. 18 (App. Div. 1989), <u>Metalsalts Corp. v. Weiss</u> , 76 N.J. Super. 291 (Super. Ct. 1962). Draft cover letter for motion for reconsideration. Draft legal brief in support of motion for reconsideration. Re: Baginski Tenure	8.0 hrs.

12-9-19	Research legal standard for motion for reconsideration in state court and the OAL. Review <u>Johnson v. Cyklop Strapping Corp.</u> , 220 N.J. Super. 250, 257 (App. Div. 1987), <u>D'Atria v. D'Atria</u> , 242 N.J. Super. 392. Review and shepardize <u>N.J.A.C. § 1:1-18.5</u> . Draft memo of law. Re: Baginski Tenure	3.5 hrs.
12-9-19		1.5 hrs.
12-10-19	Confer with client; review appointment resolutions; prepare argument rebutting that counsel was investigator. Re: Baginski Tenure	3.6 hrs.
12-10-19	Review, revise and edit motion. Re: Baginski Tenure	1.5 hrs.
12-10-19	Research applicability of "Work product" privilege. Review and shepardize <u>N.J.C.R. 4:10-2</u> . Draft memorandum of law. Re: Baginski Tenure	2.0 hrs.
12-11-19	Locate and review N.J. Court Rule 1:6-6; <i>Evidence on Motions; Affidavits</i> , for use in letter brief. Re: Baginski	.2 hrs.
12-26-19	Research authority to file disciplinary charge against clerical employee; review employee handbook policies and procedures; review Employee discipline policy; review Wallington Ordinances; review § 107-11; § 49-9; § 107-1(F); § 90-31; draft legal memo. Re: Baginski Tenure	4.1 hrs.
12-29-19	Review memo re: RIF and reorganization; confer with client; commence legal research. Re: Reorganization	2.7 hrs.
12-30-19	Review letter from attorney for P.O.; confer with Department; draft response. Re: Police Officer Discipline	.5 hrs.

12-31-19	Research Civil Service statutes and regulations re layoffs; review N.J.S.A. § 11A:8-1 et. seq. Civil Service Statutes regarding layoffs and case notes; review <u>Borough of Keyport v. Int'l Union of Operating Eng'rs</u>, 222 N.J. 314 (2015) regarding managerial prerogative to layoff employees for reasons of economy; review <u>Benzoni v. Dep't of Civil Serv.</u>, 10 N.J. Super. 103 (App. Div. 1950); <u>Stone v. Camden Cty. Bd. of Chosen Freeholders</u>, 180 N.J. Super. 430 (Super. Ct. 1981) (layoff protection in union agreements are unenforceable because layoff is managerial prerogative); <u>State v. Commc'ns Workers of Am. AFL-CIO</u>, 285 N.J. Super. 541 (App. Div. 1995) (public interest in economy is greater than employee's right to negotiate); Review N.J.A.C. § 4A:8-1.1 et. seq. (Civil Service Regulations regarding layoffs) and case notes; review <u>In the Matter of Lisa Monahan, Department of Human Services</u>, 2014 N.J. CSC LEXIS 826; <u>In the Matter of Maribel Galarza, et al., North Jersey Developmental Center</u>, 2014 N.J. CSC LEXIS 485; <u>IN THE MATTER OF WILLIAM R. HENDRICKSON, JR., VERNON TOWNSHIP, DEPARTMENT OF PUBLIC SAFETY</u>, <u>IN THE MATTER OF THOMAS J. VAN GORDER, VERNON TOWNSHIP, DEPARTMENT OF PUBLIC SAFETY</u>, 2014 N.J. AGEN LEXIS 474; Review N.J.A.C. § 4A:8-1.3 and 1.4 regarding pre-layoff actions and review by Civil Service Commission; review <u>In the Matter of Joyce Gregory-Hunt City of Paterson, Department of Community Development</u>, 2017 N.J. CSC LEXIS 50 and <u>In the Matter of Dominick Bertoldi, David Palmere and Patrick Yorke Township of West Orange, Police Department</u>, 2014 N.J. CSC LEXIS 370; Re: Reorganization	4.7 hrs.
	TOTAL HOURS	39.7
	39.7 HOURS @ \$150.00 PER HOUR	\$5,955.00
	Expenses (See attached)	\$-----
	TOTAL AMOUNT DUE	\$5,955.00

Please make checks payable to David F. Corrigan, Esq.

THE CORRIGAN LAW FIRM
54-B WEST FRONT STREET
KEYPORT, NEW JERSEY 07735
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DAVID F. CORRIGAN, ESQ.+
FRANK J. DYEVOICH, JR., ESQ.

+ CERTIFIED BY THE SUPREME COURT OF NEW JERSEY
AS A CIVIL TRIAL ATTORNEY
* ADMITTED IN NEW JERSEY AND NEW YORK

February 26, 2020

Via Electronic Mail

Hector Olmo, Borough Administrator
Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Re: Borough of Wallington
Statement of Services Rendered
January, 2020

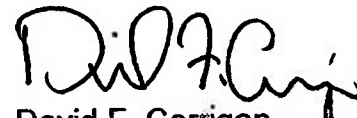
Dear Mr. Olmo:

Enclosed please find my statement of services rendered for January, 2020.

Kindly process for payment at your earliest convenience.

Thank you for your attention to this matter.

Very Truly Yours,


David F. Corrigan

The Corrigan Law Firm

Counselors At Law
54-B West Front Street
Keyport, NJ 07735

PH.: (732) 888-3868
FAX: (732) 888-9055

BILLING STATEMENT

FOR SERVICES RENDERED: JANUARY, 2020

TO: Borough of Wallington

1-2-20	Prepare for and meeting with client to discuss potential RIF. Re: Reorganization	2.5 hrs.
1-6-20	Review documents received from client; confer with adversary; confer with client. Re: Police Discipline	.8 hrs.
1-7-20	Legal research; draft legal opinion re: Civil Service Requirements re: RIF. Re: Reorganization	3.5 hrs.
1-8-20	Prepare for and meeting with CFO/Exchange emails with Borough Attorney. Re: Reorganization	3.0 hrs.
1-8-20	Search and review files for Civil Service Commission approval of Layoff plan in similar cases. Re: Reorganization	2.2 hrs.
1-8-20	Research issue of whether position of Accountant is classified within the Civil Service. Review Civil Service job listings and descriptions. Prepare legal memo. Re: Reorganization	2.5 hrs.
1-13-20	Research permissibility of transferring employee between departments and procedural requirements regarding same; review <u>N.J.S.A. § 11A:2-28</u> , <u>N.J.A.C. 4A:4-7.1A et seq.</u> Review CSC Guides, <u>In the Matter of Santiago, Police Officer, Ringwood</u> , 2018 N.J. CSC LEXIS 98; <u>In the Matter of Plis, Police Officer, Lacey Township</u> , CSC Docket No. 2019-443; <u>In the Matter of Rodriguez, Police Officer, Egg Harbor City</u> , CSC Docket No. 2019-139. Draft legal memo. Re: Reorganization	5.5 hrs.

1-14-20	Review Borough Code Chapter 30 (Ordinances delineating Departmental structure). Review <u>N.J.A.C. 4A:4-7.1</u> and case notes. Review <u>Admin. Office of Courts v. Richford</u> , 161 N.J. Super. 165 (App. Div. 1978), <u>In the Matter of Ryan Kozlak, Ocean County</u> , CSC Docket No. 2014-1441. Edit and revise legal memo. Re: Reorganization	6.5 hrs.
1-14-20	Review additional discovery from client. Re: Baginski Tenure	.2 hrs.
1-15-20	Receipt and review of Rebecky OPRA decision. Re: Baginski Tenure	.5 hrs.
1-16-20	Research CS regulations pertaining to displacement (bumping) rights and seniority. Review <u>In re Winn, Senior Public Health Nurse, Trenton</u> , CSC Dkt. No. 2017-455, 2017 N.J. CSC LEXIS 7; <u>In re Barnes-Williams, Newark Sch. Dist.</u> , CSC Dkt. No. 2013-1072, 2013 N.J. CSC LEXIS 1198, <u>In the Matter of Sharon Winn Senior Public Health Nurse, Trenton, N.J.</u> CSC Docket No. 2017-455. Draft legal memo. Re: Reorganization	8.5 hrs.
1-17-20	Receipt and review of prior layoffs (court administrator & nurse); and files regarding same. Re: Reorganization	1.5 hrs.
1-17-20	Prepare for and attendance at reorganization meeting. Re: Reorganization	3.5 hrs.
1-20-20	Draft letter to adversary re: councilperson deposition. Re: Baginski Tenure	.2 hrs.
1-22-20	Review and respond to legal opinion request. Re: Legal Opinion	.5 hrs.
1-22-20	Confer with client and render legal opinion; review emails. Re: Library Issue	.5 hrs.
1-24-20	Review and respond to issue related to fire department stipend. Re: Stipend Issue	.2 hrs.

1-27-20	Review amended Rule 26 disclosures. Re: Baginski Federal	.2 hrs.
1-27-20	Review proposed Indemnification Ordinance. Review <u>N.J.S.A. § 59:10-4</u> ; Wallington Borough Code § 26; Proposed Wallington Ordinance § 26A; <u>Palmentieri v. City of Atl. City</u> , 231 N.J. Super. 422 (Super. Ct. 1988). Draft legal memo; prepare memo to client. Re: Ordinance	5.0 hrs.
1-29-20	Review, revise and edit indemnification ordinance; prepare memo regarding same. Re: Ordinance	.8 hrs.
1-30-20	Prepare for and attendance at meeting to prepare councilperson for federal court depositions. Re: Baginski Federal Court	4.5 hrs.
1-30-20	Exchange of emails; respond to information request. Re: Police Discipline	.5 hrs.
	TOTAL HOURS	53.1
	53.1 HOURS @ \$150.00 PER HOUR	\$7,965.00
	Expenses (See attached)	\$-----
	TOTAL AMOUNT DUE	\$7,965.00

Please make checks payable to David F. Corrigan, Esq.

**RICHARD S. CEDZIDLO
ATTORNEY AT LAW
177 PATERSON AVENUE
P. O. BOX 3127
WALLINGTON, NEW JERSEY 07057**

**(973) 472-1133
FAX: (973) 472-1135**

November 30, 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
11/01/18	0.9	Review numerous OPRA requests; prepare response;
11/02/18	1.8	Review documents and proposals from Mc Carter & English; receive correspondence settlement offer;
11/07/18	2.9	Review lawsuit filed by Parent Company for DOKA; prepare answer to complaint filed by DOKA; file answer via e-courts; Review e-mails - COAH;
11/08/18	4.4	Attend Special Meeting; Ph.conf w.Lamb, Esq re: new proposal of Nuckle for COAH litigation; prepare resolution; receipt /review of Aff.of Services submitted by Kaffafian;

11/15/18	4.8	Review OPRA Request; receive Settlement Offer from Daniel Steinhagen, Esq re: WREIT Property; review e-mail re: COAH; prepare notice of RFQs; prepare RFQ for all professionals;
11/16/18	3.8	Review OPRA response; receipt/review Motion to Intervene and Dismiss Complaint ; receive e-mails COAH; prepare letters to all professionals - RFQs;
11/19/18	3.9	review numerous e-mails re: COAH; request from Simon for meeting; receive e-mail from Mc Manus re: dates for mediation; review letter of intent re: DPW Contract; prepare DPW contract and sent to DiPalma for review and approval;
11/27/18	4.8	Attend mediation session Warren NJ; Research past redevelopment plan and easement litigation; ph.conf. Re: close out bond;
11/28/18	0.6	Ph. Conf w/ Kafafian, Esq; check on status of OPRA response;
11/29/18	5.7	Attend two mediation sessions, Newark NJ; ph.conf. W/ rep for Crown Castle; receive signed contract from Teamsters;
11/30/18	0.4	Receive several letters from intervenor in Doka lawsuit: receive email from atty for Donald Nuckel

34.00 hrs.

October 31 , 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
10/01/18	0.9	Receipt of flash drive from Bonsall, Esq containing docs; receipt of motion papers from Simon;
10/02/18	1.6	Review lengthy letter submitted by Bonsall to Judge Farrington; prepare Certification;
10/03/18	2.8	Prepare response to opposition filed by Bonsall, Esq; ph.conf. W/ Crown Castle; review proposed consent; prepare resolution; prepare Rice notice;
10/04/18	3.9	Receipt of Order entered by Judge Farrington; ph.conf. W/ Simon, Esq (2X); ph.conf. w/Szabo; prepare e-mail; ph.conf w/McManus; prepare numerous resolutions; receive e-mail re: wi-14 County Counsel - senior center;
10/05/18	1.9	Receipt review lawsuit filed by Umdasch Real Estate; research files for resolutions or ordinances;
10/09/18	1.6	Receive e-mail from Bonsall; prepare letter to Bonsall; ph.conf. Re: consent to sublease;
10/10/18	5.7	Prepare resolutions; attend meeting with planner and Simon in Warren NJ; receive memo from Mc Manus and respond; prepare newspaper notice;

10/19/18	2.9	Receipt/review of Order to Show Cause in Donald Nucle v. Boro of Wallington; review Verified Complaint; research allegations of Complaint and Statute;
10/23/18	2.7	Review various Opra requests; receive various e-mails re: COAH lawsuit; provide Simon/Szabo with documents and Borough Code
10/24/18	4.8	Review analysis from Szabo; receive e-mail from Szabo; receive e-mail from McManus; prepare letter to Court on KC Landscaping; attend borough letter search for Affordable Housing reports and resolution; review numerous e-mails; receive call on DOKA lawsuit; apply for extension on time to Answer; ph.conf w/Kafafian; prepare e-mail;
10/25/18	4.4	Ph. Conf w/ Steinhagen, Esq review lawsuit; legal research summary actions in OPRA cases; prepare Verified Answer and Affidavit of Victor Polce; prepare resolutions for public meeting; ph. Conf w/ Comt re: KC landscaping
10/26/18	1.6	Prepare letter notifying KC of adjournment; prepare letter re: Crown castle; deliver answer to Farrington;
10/29/18	6.7	Attend all day Court ordered mediation - Newark NJ; conference re: DOKA Lawsuit
10/30/18	3.9	Attend OSC-Judge Farrington re: Nucle v Wallington; prepare Consent Order - COAH; prepare Notice of special meeting;
10/31/18	4.4	Attend CMC before Judge Farrington re: COAH Lawsuit; Ph. Conf with Lamb, Esq; prepare resolutions;

49.8 hrs

July 2, 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
06/05/18	0.9	Ph.conf w/detective; review agreement; ph.conf.w/atty for intervener
06/06/18	2.7	Lengthy ph.conf w/Frascella; Division of Alcoholic Beverages; ph.conf. W/Molinelli, Esq; ph.conf. W/Robert Kaye, Esq (2x), review Det. Rock e-mails; ph.conf w/intervenor
06/07/18	3.6	Receive e-mail and documents from attorney for Claude Branda; prepare several resolutions; attend special meeting;
06/08/18	2.9	Prepare Ordinance; ph.conf. W Neglia re: delinquent field projects; prepare letter;
06/12/18	1.9	Review file re: vacation of certain properties; review report of Sontz, Esq re: rent leveling; review docs submitted by ANUHEA Property; ph.conf w. Molinelly, Esq and Kaye. Esq re: liquor licence transfer and amendment filed with the Alcohol Beverage; send risk manager authorization signed by Mayor;
06/13/18	3.5	Call several appraisal companies; review lengthy e-mail from Kaye, Esq; ph.conf w. Lieutenant L.T. Rock; prepare resolution; revise indemnification; Agreement sent to council; lengthy phone conference with Turtletaub, Esq., re: refusal of job to perform work to release bond re: 165 Paterson Ave/ 12 Locust

06/14/18	3.8	Prepare numerous resolutions; prepare rice notice; prepare letter to 3 appraisal companies;
06/15/18	3.4	Prepare Ordinance; prepare resolutions;
06/18/18	2.9	Ph.conf with detective; receipt review of Court Order granting Morningside leave to Intervene; review materials re: liquor license transfer and memo from ABC;
06/19/18	1.6	Prepare resolutions; ph.conf. w/ counsel re: COAH litigation;
06/25/18	1.9	Ph conf w McManus, prepare resolution: ph conf liquor license
06/26/18	4.2	Receive info from tax collector, prepare letter to Court, prepare ordinance; search for public contracts info at request of auditor: review contract received from Borough of Carlstadt
6/27/18	3.2	Prepare order, prepare letter to Judge Toskos and all counsel: prepare auditors letter; prepare resolution; review docs liquor license;
06/28/18	4.1	Meeting w land use candidate; Prepare resolution; ph.conf. W. Atty for Carlstadt; receive numerous letters to Court from interveners; ph.conf. Re: properties to be vacated; ph.conf w/ Bull re: liquor license;
06/29/18	1.4	send resolution and information to Bonchi, Esq; prepare memo to Simon, Esq; ph.conf w. Donahue, Esq; prepare letter together with signed contract;

42 hrs

June 4, 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
05/01/18	2.8	review changes to agreement from Judge Mizdol; ph.conf w/Donahue, Esq, prepare resolution;
05/02/18	3.9	prepare resolutions,; receive Order from Judge Toskos; receive letter from John Lamb, Esq; ph.conf w/county searching for town incorporation;
05/7/18	4.6	Receipt of Answer filed on behalf of Wallington; attend Bergen Cty Register Office - perform search of incorporation records; receive letter from Judge Mizdol; ph.conf w/ Genova Burns; prepare resolutions; attend meeting;
05/09/18	5.3	Attend hearing Bergen County Board of Taxation; receive memo from Markel; receive memo from Hannon; ph.conf w/ Civil services; prepare letter re: town action; prepare resolutions;
05/11/18	1.9	Ph.conf w/ atty. for Morningside; prepare resolutions ;
05/14/18	3.2	Prepare resolutions; ph.conf w/Genova; receive docs. from Neglia;
05/17/18	0.8	Receive Stip of Dismissal; ph.conf w/atty. for intervener;
05/18/18	1.9	Receipt/review Notice of Motion to Intervene; Cert.of Bonshall. Esq; Cert. Of James Nucle and legal Brief; research case law cited in legal Brief

05/21/18	1.6	Review numerous OPRA requests; review statute and caselaw re: exceptions and e-mails as documents;
05/22/18	2.8	Prepare numerous resolutions; ph.conf w/ COAH atty and mediator;
05/23/18	1.7	Review documents to respond to OPRA; ph.conf. W/Sarto, Esq; ph.conf w/civil service; ph.conf. W/Donahue, Esq from Carlstadt;
05/24/18	3.2	meeting w/Chief re: Contract; revise Contract; prepare numerous resolutions including 2 shared services; ph.conf with civil service;
05/29/18	1.9	ph.conf w/planner re:RFQ appts; revise contract;
05/30/18	2.7	Revise case law & statute; prepare OPRA response; ph.conf w/detective
05/31/18	3.7	Research for Ordinance; review all documents to apply for EPL; prepare street resolution; review vacation documents; letter from PBA;

42.00 HRS

April 30, 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
04/02/18	3.8	Meeting with several violation Clerk candidates; prepare resolutions; ph.conf.w. Civil Serv. ;
04/03 /18	4.5	Meeting with candidates Violation Clerk; ph. Conf. W. Adm. Cand.; Receipt review numerous e-mails; ph.conf.w.Brendis Wrigley; ph.conf. Police contract; prepare resolutions;
04/04 /18	5.6	Attend Bergen County Board of Taxation re: adjournment ; attend law library re: research adm. code lay off civil service; prepare numerous resolutions; prepare rice notices
04/13/18	4.6	Review OPRA Request; review letters from Job; prepare Rice Notice; receipt review two separate motions to Intervene; pn.conf w. Lamb; Esq
04/17/18	3.9	Prepare notice; prepare letter to clerk w/all resumes for Boro Admn and CFO positions receipt review lawsuit filed by Morning side at Wallington; ph.conf w/Beattie Padovano; supply report - COAH
04/19/18	3.7	Review lawsuit; prepare proposed Order and letter to Judge Toskos; ph.conf. W/ Genova Burns; prepare resolutions;
04/20/18	3.8	Revise contract for Captain; Ph.conf.w Sorto; prepare OPRA response
04/23/18	1.7	Ph.conf w Risk Manager; receive docs from Risk manager; ph.conf.w atty for proposed intervener; revise contract;

04/24/18	2.2	Prepare resolution; receive insurance documents; ph.conf w/ Sontz; review statue;
04/25/18	3.7	Ph. conf w/Sontz; review statutory law; review revised agreement from Donahue, Esq.; ph. conf w/Genova Burns; receive Order from Toskos; prepare letter to all COAH counsel;
04/26/18	4.8	attend meeting w/boro administrator; revise contract;
0427/18	4.6	revise contract; review COAH all pleadings; serve Order upon all counsel of records; prepare answer and separate defenses to law suit; research re: conflict in representing clerk; ph.conf.
04/30/18	3.7	very lengthy ph. conf w. Division of Commercial recording re: short form - standing; revise answer; receive revised letter from Mizdol;

March 29, 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
03/01/18	2.8	Several ph. conf w/Boro of Carlstad; prepare "Rice" Notice to all Court Personnel; receive OPRA request;
03/02/18	3.3	Prepare ordinances for review next meeting;
03/05/18	3.7	Attend meeting, ph.conf w/Genova Burns re: Kudlacik contract and PBA negotiations review COAH; review successful bids; ph.conf w/ Risk managers re: confirm agent for all insurance coverage;
03/06/18	3.9	Several ph.conf w/Carlstadt Boro Atty; ph.call w/Novello, Esq receive letter re: laterals; receive proposal from Carlstadt; draft Indemnification; review Shade Tree Ordinance;
03/07 /18	4.8	Prepare numerous resolutions; research ordinances from other towns; Prepare e-mail to Risk Manager
03/08/18	3.6	Prepare resolutions; ph.conf proof of loss- Police Building; research and copy documents in response to Infante OPRA request
03/12/18	5.5	Prepare memo to expert re: COAH litigation availability for ph. conf. and mediation session; receive reply; prepare memo to McManus/Bauers reavailability ; receive and review various insurance policies from Bergen Risk Managers, INC; receive reservation of Rice Letter; prepare letter to forensic accountant and to auditor; prepare resolutions; various ph conf / emails re: Infante status and shared

service agreement; prepare resolutions; ph confs w several employees sued by former firefighter

- | | | |
|----------|-----|--|
| 03/14/18 | 2.7 | Receive e-mails from Coah master receipt of numerous OPRA requests; draft e-mails; ph.conf re: document request; prepare Rice Notices - Court; prepare admin. advertisement; |
| 03/15/18 | 3.8 | Review documents; prepare letter to insurance company; prepare resolutions; ph.conf.w/Carlstadt representatives; review terms/conditions of insurance coverage; |
| 03/19/18 | 3.6 | Attend meeting; review document responses; prepare letter to Hannon, Esq.; prepare e-mail to McManus; schedule meeting re: Coah; review report from expert; |
| 03/22/18 | 2.9 | Ph.conf w/Weinet, Esq; prepare resolution "safe/secure"; revise ordinance; ph.conf w/McManus; ph.conf w/Genova Burns; ph.conf re: Carlstadt Court; review insurance claim |
| 03/23/18 | 3.9 | Prepare resolutions; prepare letter to Judge Toskos and proposed Order; corresp w/Country re: Courts |
| 03/26/18 | 3.7 | Prepare resolution ph.conf and letter from Sordo, Esq; ph.conf w/Atty for PSE&G; receive resume from Polce; numerous ph.conf w/candidates; ph.conf w/Carlstad |
| 03/27/18 | 3.9 | Ph.conf w/Wrigley; ph.conf with Carlstadt; prepare several Rice Notices; numerous emails and ph. Conf. W/ candidates; prepare letter re: Corner Collection; prepare Resolution; |
| 03/28/18 | 3.8 | Review resumes for violation clerk; set of interviews; ph.conf re: investigation; prepare letter to insurance company; ph.conf.w/Hannan; review application request for standing Certificate; ph.conf./w. CFO candidate; |
| 03/29/18 | 5.7 | Attend interviews for CFO and administrator; prepare contract review Hannon's comments: |

61.6 hrs

February 28, 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
02/01/18	1.9	Research municipal land use law; prepare RFQ; prepare notice requesting applications; ph call environmental
02/2/18	3.7	Prepare numerous resolutions; receive reports from Stolarz; meeting with Sontz in office regarding Ordinance changes;
02/05/18	2.9	Review all docs. and contracts with appraisal systems for 2014 reassessment; receive proposed contract for police officer; review PBA contract for steps;
02/06/18	1.9	Review proposed agreement with Carlstadt; ph conf with Judge from Carlstadt; review COAH Pleadings;
02/7 /18	5.9	Attend meeting of the Bergen County Board of Taxation; ph conf w various professionals re: issues in tax matter; prepare letter to Board secretary; prepare numerous resolutions; ph conf w Brendis Montijo-Wrigley; meeting with Sontz in office;
02/08/18	2.9	Prepare numerous resolutions; numerous ph conf re: shared services with Carlstadt; ph conf w Hannon, Esq; send numerous docs to Hannon; receipt of docs from Neglia re: Garbage bids;

02/9/18	3.8	Numerous ph calls w Carlstadt representative; prepare several resolutions; perform legal research garbage issue; ph conf w appraisals system;
02/12/18	3.9	Receive review forensic acct report; ph conf w Merkel re: claim; receive letter from Merkle via e-mail; numerous ph confs w. Brendis, Borough att. for Carlstadt; receive memo from Genova Burns; Ph conf w admn candidates set up interviews; prepare numerous document requests;
02/13/18	3.8	ph conf w Genova Burns re: employee issue; receive docs from Clerk send to Genova Burns; review information on bank accounts; legal research
02/14/18	2.7	Numerous ph conf w Carlstatdt officials; legal research re; land use RFQ;
02/15/18	3.7	Prepare RFQ; send courtesy copies of RFQ; receive report from forensic acct; prepare demand letter to KC, prepare letter to insurance company;
02/16/18	4.9	Attend interview of three Admn candidates; receive letter from Court Admn; Prepare numerous resolutions and prepare docs requests;
2/20/18	2.9	Ph conf with League; research CFO RFQ; numerous ph conf re: Carlstadt Court; receive contract from League; prepare ad; ph conf with candidate;
2/21/18	3.7	Ph conf w Zisa; ph conf w Appraisal Systems re: tax issues; ph.conf w. League of Municipalities; prepare Ordinance; prepare resolutions; left message COAH;
2/22/18	2.8	Receive proposal from Apprisal Systems; ph.conf w/McManus; ph conf w/administrator candidate; ph conf atty for RFQ; send out numerous courtesy RFQs; ph. Conf re: Carlstadt; ph. Conf w/expert
2/23/18	4.4	Research re: garbage contract; prepare letter to judge Toskos; prepare Court Order; prepare memo proposed dates to McManus; prepare resolutions;

- 2/27/18 3.8 Attend meeting; ph. Conf w. Merkel re: claim; ph. Conf w/ Novello, esq - development in east Rutherford affecting sewage lines; prepare resolutions;
- 2/28/18 3.9 Prepare Ordinances; prepare resolution; conf w/Appraisal systems; ph conf w companies re: documents ; ph conf and email from t-mobile; hrs ph conf; Carlstadt Board Atty meeting investigator re: road incident; ph conf w crifasi re shared services; prepare marijuana ord.; receipt of Court

63.5 hrs

January 31, 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
01/04/18	0.8	Notify some prof. Of appt; prepare contracts
01/05/18	0.9	Review maps prepared by Neglia for Lucia Place Cedar Street; Prepare letters to property owners
01/08/18	0.8	review Subpoena served on Baginski; ph. Conf w. atty for Fehl; prepare letter confirming Baginski to remain “ on call”;
01/09/18	3.6	Legal research - police hire; prepare numerous resolutions for public meeting
01/10/18	2.2	Prepare additional resolutions; prepare revised demand letter for KC Land.
01/11/18	2.6	Receive inf. From Tanderis; prepare Ordinance; prepare letter to Labor Attys.
01/12/18	0.7	Ph. Conf. W. NJLM; post ad for adm.;

01/17/18	1.8	Prepare legal notice spec. meeting ; research potential w-2 operators; prepare resolutions ; ph. Conf w. new risk manager
01/18/18	2.4.	Attend meeting; provide docs. To labor atty; prepare contracts;
01/19/18	0.9	Receive response to adm, RFQ; receive request for courtesy copy of RFQ;
01/22/18	1.9	Receipt review letter re: NJ Fuel LLC.; prepare resolution; review all responses to auditor RFQ;
01/24/18	1.3	Review comments re: vacant land analysis; review prior Court order; prepare letter to Judge Toskos and special master;
01/25/18	1.8	Prepare Ord.; ph. Conf. Re: appoint. Of Auditor; Prepare resolution
01/26/18	2.9	Receive memo from Judge Toskos; prepare lettr. To Court; Prepare response to McManus; receive ltr. From Nursery 2Go; Prepare numerous resolutions; ph conf w/ risk manager;
1/29/18	1.5	Prepare Court Order per Judge Toskos; ph conf w/ engineer re: missing documents; receive responses;
1/30/18	0.9	Prepare letter Genova Burns; contact special Master; prepare resolution
1/31/18	3.2	Prepare various resolutions including Mt. Pleasant and King Street projects; review contract award-Civic Center generator; corresp. from Court; ph conf w/Walentowicz

30.2

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Apr 3, 2020

Invoice Num: 2020-2549

Billing Through: Mar 31, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/5/2020	MG	Billable Time Reviewed letter from Marc Liebman regarding discovery issue; drafted response letter.	1.50	\$150.00	\$225.00
3/11/2020	MG	Billable Time Reviewed ruling on appeal issued by Appellate Court.	0.25	\$150.00	\$37.50
3/12/2020	MG	Billable Time Reviewed letter from Umdasch attorney regarding discovery.	0.25	\$150.00	\$37.50
3/16/2020	MG	Billable Time Drafted letter to Marc Liebman regarding issues with discovery propounded.	1.25	\$150.00	\$187.50
3/17/2020	MG	Billable Time Reviewed discovery demands of Umdasch related to remaining counts of complaint; work on obtaining documents including email with IT consultant.	3.00	\$150.00	\$450.00
3/24/2020	MG	Billable Time Email with counsel regarding status of Case Management Conference scheduled for 3/25.	0.50	\$150.00	\$75.00
3/24/2020	MG	Billable Time Reviewed letter from Marc Liebman; drafted letter to court regarding Case Management Conference.	1.50	\$150.00	\$225.00
3/26/2020	MG	Billable Time Drafted letter to Marc Liebman regarding delinquent discovery.	1.00	\$150.00	\$150.00
3/27/2020	MG	Billable Time Reviewed court notice submitted by Judge Farrington.	0.50	\$150.00	\$75.00
3/29/2020	MG	Billable Time Email with IT professional for borough regarding uploading documents for service.	0.25	\$150.00	\$37.50
3/31/2020	MG	Billable Time Email with opposing counsel regarding status of upcoming depositions and work on rescheduling; letter to opposing counsel regarding status of discovery issues.	2.00	\$150.00	\$300.00

Total Service Amount: **\$1,800.00**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Apr 3, 2020

Invoice Num: 2020-2549

Billing Through: Mar 31, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -
Managed by (RM)

Amount Due This Invoice: \$1,800.00

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2020-2507	3/6/2020	\$12,397.34	\$12,397.34	\$0.00

Total Amount Due Including This Invoice: \$1,800.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Apr 3, 2020

Invoice Num: 2020-2530

Billing Through: Mar 31, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/3/2020	MG	Billable Time Assisted Leonard Seaman in finalizing discovery; email to Borough Administrator regarding discovery.	1.00	\$150.00	\$150.00
3/3/2020	LS	Billable Time finalize discovery responses, letter to counsel re same.	1.00	\$150.00	\$150.00
3/3/2020	LS	Billable Time email to client re discovery responses	0.25	\$150.00	\$37.50
3/3/2020	LS	Billable Time letter to counsel for defendant re discovery responses	0.25	\$150.00	\$37.50
3/6/2020	LS	Billable Time receipt of certifications to discovery responses, letter to plaintiff serving certified responses	0.50	\$150.00	\$75.00
3/6/2020	LS	Billable Time notice to produce to plaintiff	0.50	\$150.00	\$75.00
3/6/2020	LS	Billable Time notice of deposition to plaintiff	0.50	\$150.00	\$75.00
3/6/2020	LS	Billable Time letter to plaintiff re notice to produce and deposition notice	0.25	\$150.00	\$37.50
3/18/2020	MG	Billable Time Drafted motion to extend discovery.	3.00	\$150.00	\$450.00
3/18/2020	LS	Billable Time finalize and file motion to extend discovery	0.50	\$150.00	\$75.00
Total Service Amount:					\$1,162.50

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
3/6/2020	LS	Postage Fee regular mailed to Joseph P. De Marco, Esq. Borough's First Notice to Produce and a Notice of Deposition for Kurt Cassidy.	\$0.65
3/6/2020	LS	Postage Fee Regular mailed to Joseph P. De Marco, Esq. Borough's Answer to Defendant's first set of interrogatories and documents Bates Stamped WALL 001 through WALL 239.	\$7.84
3/6/2020	LS	Photocopies 1 photo copy of documents Bates Stamped WALL 001 through WALL 239 mailed to Joseph P. De Marco, Esq.	\$59.75

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Apr 3, 2020

Invoice Num: 2020-2530

Billing Through: Mar 31, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Reimbursable Expenses:

Date	Employee	Description	Amount
3/18/2020	NJ Business Services (Gateway)	filing fee	\$50.00
		Online filing fee for filing of Motion to Extend Discovery.	
3/18/2020	LS	Motion	\$50.00
		Filing fee to file Motion to Extend discovery.	

Total Expenses: **\$168.24**

Amount Due This Invoice: **\$1,330.74**

Account Summary

Ref. Received	Ref. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2020-2484	3/6/2020	\$5,079.00	\$5,079.00	\$0.00

Total Amount Due Including This Invoice: **\$1,330.74**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Apr 3, 2020

Invoice Num: 2020-2518

Billing Through: Mar 31, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/2/2020	MG	Billable Time Reviewed all documentation for amended Rule 26 disclosures; amended disclosures as such including new witnesses.	4.50	\$150.00	\$675.00
3/2/2020	LS	Billable Time email to Selagy re Olakowski deposition	0.25	\$150.00	\$37.50
3/3/2020	MG	Billable Time Finalized all documents related to Rule 26 and finalizing updating of disclosures.	3.50	\$150.00	\$525.00
3/3/2020	LS	Billable Time email from OAL re hearing schedule	0.25	\$150.00	\$37.50
3/4/2020	MG	Billable Time Revision to Rule 26 Disclosure as requested by Richard Malagiere; emailed to all attorneys.	0.50	\$150.00	\$75.00
3/5/2020	RM	Billable Time Review and revise R. 26 Amended Disclosure and revise same; conference with associate regarding same.	1.00	\$150.00	\$150.00
3/6/2020	LS	Billable Time letter from counsel for plaintiff to court re conference	0.50	\$150.00	\$75.00
3/6/2020	LS	Billable Time letter to Summit Risk re collateral estoppel by OAL action and impact on settlement offers in civil rights case	1.50	\$150.00	\$225.00
3/6/2020	LS	Billable Time email to client re letter to Summit Risk	0.25	\$150.00	\$37.50
3/6/2020	LS	Billable Time meeting with Corrigan re tenure charge investigation	0.75	\$150.00	\$112.50
3/8/2020	MG	Billable Time Reviewed plaintiff's Rule 26 Disclosure provided by JIF counsel; memo to file accordingly.	0.75	\$150.00	\$112.50
3/16/2020	LS	Billable Time email with counsel re letter to court requesting discovery extension	0.25	\$150.00	\$37.50
3/16/2020	LS	Billable Time letter from Selagy to court re discovery extension	0.25	\$150.00	\$37.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102
Moonachie, NJ 07074
Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Apr 3, 2020
Invoice Num: 2020-2518
Billing Through: Mar 31, 2020

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/18/2020	MG	Billable Time Email related to new suit against Baginski regarding damages.	0.25	\$150.00	\$37.50
3/18/2020	LS	Billable Time email with counsel re damages suit re water charges	0.25	\$150.00	\$37.50
3/25/2020	LS	Billable Time notice from court re adjournment of settlement conference	0.25	\$150.00	\$37.50
Total Service Amount:					\$2,250.00

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
3/6/2020	Lexis Nexis	Lexis Nexis Legal Research	\$117.00
Total Expenses:			\$117.00
Amount Due This Invoice:			\$2,367.00

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2020-2475	3/6/2020	\$6,487.50	\$6,487.50	\$0.00

Total Amount Due Including This Invoice: \$2,367.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Apr 3, 2020

Invoice Num: 2020-2526

Billing Through: Mar 31, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Fehl v. Wallington (Fehl v. Wallington 1088.15:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/9/2020	LS	Billable Time	0.25	\$150.00	\$37.50
		letter from cocounsel re final pretrial conference			

Total Service Amount: \$37.50

Amount Due This Invoice: \$37.50

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2020-2437	2/5/2020	\$862.50	\$862.50	\$0.00

Total Amount Due Including This Invoice: \$37.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Mar 6, 2020

Invoice Num: 2020-2507

Billing Through: Feb 29, 2020

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
2/2/2020	MG	Billable Time Reviewed all correspondence submitted by opposing counsel; drafted response to letter regarding obtaining files from Dorothy Siek.	1.50	\$150.00	\$225.00
2/3/2020	MG	Billable Time Research regarding dismissing additional counts when no additional relief is available; drafted letter to court in response to objection to five day order.	2.50	\$150.00	\$375.00
2/3/2020	MG	Billable Time Conference with Borough Administrator regarding how documents were obtained from Dorothy Siek; drafted response letter to Umdasch counsel.	1.50	\$150.00	\$225.00
2/5/2020	LS	Billable Time Legal research (LEXIS) re Spring Motors requirements for pleading; letter to court in response to plaintiff's position on 5 day order and sufficiency of pleadings in amended complaint.	1.00	\$150.00	\$150.00
2/5/2020	LS	Billable Time letter to court re sufficiency of pleading of damages by plaintiff	1.50	\$150.00	\$225.00
2/7/2020	MG	Billable Time Reviewed letter from Umdasch counsel; drafted response letter.	1.00	\$150.00	\$150.00
2/10/2020	MG	Billable Time Drafted letter to Marc Liebman regarding document inspection; reviewed rules on motion for leave to appeal; began compiling documents for appendix.	2.00	\$150.00	\$300.00
2/11/2020	LS	Billable Time analyze and compile draft appendix	1.50	\$150.00	\$225.00
2/11/2020	MG	Billable Time Compiled documents for appendix for appeal.	7.00	\$150.00	\$1,050.00
2/12/2020	MG	Billable Time Conference with opposing counsel to review Planning Board files.	1.00	\$150.00	\$150.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Mar 6, 2020

Invoice Num: 2020-2507

Billing Through: Feb 29, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
2/12/2020	MG	Billable Time Completed appendix; removed duplicate documents.	6.00	\$150.00	\$900.00
2/12/2020	LS	Billable Time review format of appellate appendix	1.00	\$150.00	\$150.00
2/12/2020	LS	Billable Time prepare draft brief of motion for leave to appeal	5.00	\$150.00	\$750.00
2/13/2020	MG	Billable Time Created table of Appendix; removed excess documents.	5.50	\$150.00	\$825.00
2/13/2020	LS	Billable Time review of appendix contents, continued preparation of brief in support of motion for leave to appeal	4.50	\$150.00	\$675.00
2/14/2020	MG	Billable Time Assisted Leonard Seaman with completion of appeals including work on brief and compiling all exhibits into form for filing.	6.50	\$150.00	\$975.00
2/14/2020	LS	Billable Time email with Hector Olmo re filed appeal	0.25	\$150.00	\$37.50
2/14/2020	LS	Billable Time preparation of appellate brief and appendix, notice of motion for leave to appeal and related documents, file same	8.50	\$150.00	\$1,275.00
2/18/2020	MG	Billable Time Drafted discovery request related to constitutional violations remaining in complaint.	2.50	\$150.00	\$375.00
2/18/2020	LS	Billable Time email from court reporter re transcript costs	0.25	\$150.00	\$37.50
2/19/2020	MG	Billable Time Finished draft discovery demands related to civil rights claim; reviewed status of previous discovery provided by Plaintiff; email to intervenor counsel regarding discovery.	3.50	\$150.00	\$525.00
2/20/2020	LS	Billable Time notice from court re approval of form of filings	0.25	\$150.00	\$37.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Mar 6, 2020

Invoice Num: 2020-2507

Billing Through: Feb 29, 2020

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
2/21/2020	RM	Billable Time Review and revise interrogatories and document production demands on remaining counts of complaint.	1.00	\$150.00	\$150.00
2/21/2020	MG	Billable Time Revised discovery demands.	1.00	\$150.00	\$150.00
2/21/2020	MG	Billable Time Research and memo on substantive due process.	2.00	\$150.00	\$300.00
2/25/2020	LS	Billable Time forward appellate papers for printing	0.50	\$150.00	\$75.00
2/26/2020	LS	Billable Time notice from court re case management conference	0.25	\$150.00	\$37.50
2/26/2020	LS	Billable Time compile printed appellate papers for submission to court	0.75	\$150.00	\$112.50
2/26/2020	LS	Billable Time letter to court re hard copy of appellate papers	0.50	\$150.00	\$75.00
2/26/2020	LS	Billable Time email with counsel for plaintiff re appellate filings	0.25	\$150.00	\$37.50
2/27/2020	LS	Billable Time email to client re motion to stay and for reconsideration	0.25	\$150.00	\$37.50
2/28/2020	LS	Billable Time receipt and review of reply brief by plaintiff re motion for leave to appeal	2.00	\$150.00	\$300.00
2/28/2020	LS	Billable Time receipt and review of brief by WREIT re motion for leave to appeal	0.50	\$150.00	\$75.00

Total Service Amount: \$10,987.50

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
2/3/2020	Lexis Nexis	Lexis Nexis Legal Research	\$180.00
2/5/2020	Lexis Nexis	Lexis Nexis Legal Research	\$96.00

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Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Mar 6, 2020

Invoice Num: 2020-2507

Billing Through: Feb 29, 2020

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -

Managed by (RM)

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
2/14/2020	Blue Dog Graphics	Blue Dog Graphics	\$105.05
		Invoice #54524 439 Sheets, two sides 3 hole drill	
2/18/2020	Court Reporter	Court Reporter	\$303.85
		Invoice #00036225 Deposit for transcripts: 10/25/19 and 1/20/20	
2/18/2020	LS	Motion	\$50.00
		Filing fee for filing of Motion for Leave to Appeal Summary Judgment with Court.	
2/21/2020	Lexis Nexis	Lexis Nexis	\$269.00
		Legal Research	
2/26/2020	FED EX	Federal Express	\$32.74
		Fed Ex to Kevin Collins, Superior Court of New Jersey. Tracking # 777869139100.	
2/26/2020	Blue Dog Graphics	Blue Dog Graphics	\$373.20
		Invoice#54589 Three (3) copies and binding of Brief and and Appendices numbered 1, 2, 3 and 4.	

Total Expenses: \$1,409.84

Amount Due This Invoice: \$12,397.34

Account Summary

Ref. Received	Ref. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2020-2461	2/5/2020	\$4,057.50	\$3,743.00	\$4,057.50

Total Amount Due Including This Invoice: \$16,454.84

The Law Offices of Richard Malagiere

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Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Mar 6, 2020

Invoice Num: 2020-2475

Billing Through: Feb 29, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
2/3/2020	RM	Billable Time Attend day 2 of Police deposition.	2.50	\$150.00	\$375.00
2/3/2020	RM	Billable Time Attend continuation of Police deposition.	1.50	\$150.00	\$225.00
2/4/2020	MG	Billable Time Began review of documents provided by David Corrigan.	1.50	\$150.00	\$225.00
2/6/2020	MG	Billable Time Organization of documents propounded through discovery.	1.50	\$150.00	\$225.00
2/6/2020	LS	Billable Time letter from Corrigan re depositions	0.25	\$150.00	\$37.50
2/7/2020	MG	Billable Time Drafted Rule 26 disclosure letter for new witness; work on organizing documents produced JIF.	3.00	\$150.00	\$450.00
2/7/2020	LS	Billable Time legal research (LEXIS) re application of Elwood Branti test to policy implementing employees	2.00	\$150.00	\$300.00
2/7/2020	LS	Billable Time prepare letter to Ben Schulman re claim analysis	3.50	\$150.00	\$525.00
2/7/2020	LS	Billable Time email to Hector Olmo re claims analysis	0.50	\$150.00	\$75.00
2/8/2020	LS	Billable Time email from Tandy re depositions of Borough representatives	0.25	\$150.00	\$37.50
2/9/2020	MG	Billable Time Review of internet searches for photos of Baginski to dispute his claims.	1.00	\$150.00	\$150.00
2/18/2020	RM	Billable Time E-mail with labor Attorney confirming prep session with Councilman Rachelsky and several witness issues for tenure hearing.	1.00	\$150.00	\$150.00
2/18/2020	MG	Billable Time Emails with David Corrigan regarding upcoming issues in tenure hearings.	0.25	\$150.00	\$37.50

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Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Mar 6, 2020

Invoice Num: 2020-2475

Billing Through: Feb 29, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
2/20/2020	MG	Billable Time Uploaded files related to Baginski;s conduct being against his complaint; review of Rule 26 disclosure.	1.50	\$150.00	\$225.00
2/21/2020	RM	Billable Time Emails to Labor Counsel with information on witnesses and evidence for upcoming tenure hearing.	0.75	\$150.00	\$112.50
2/21/2020	RM	Billable Time Review document production my labor counsel in tenure hearings to see if we should produce it in the Federal Action; E-mail to defense counsel with link to documents for their review and analysis.	1.50	\$150.00	\$225.00
2/21/2020	MG	Billable Time Email with labor counsel regarding additional witness to disclose via Rule 26.	0.25	\$150.00	\$37.50
2/24/2020	RM	Billable Time Meeting to prepare Gene for deposition.	1.50	\$150.00	\$225.00
2/24/2020	MG	Billable Time Located and reviewed the report on "big fish email".	1.00	\$150.00	\$150.00
2/25/2020	LS	Billable Time attend deposition of Gene Raschelski	6.50	\$150.00	\$975.00
2/25/2020	RM	Billable Time Coordinate with counsel for Victor Polce and forensic accountant and labor counsel for tenure hearing testimony; conferences with defense team and municipal witnesses.	2.00	\$150.00	\$300.00
2/25/2020	MG	Billable Time Reviewed police report between council member and Baginski provided by police department.	0.50	\$150.00	\$75.00
2/27/2020	RM	Billable Time Coordinate with labor counsel and Mayor regarding new witnesses and materials to help with the tenure hearings.	2.00	\$150.00	\$300.00
2/27/2020	MG	Billable Time Review of tenure charges discovery for relevancy in federal case.	1.50	\$150.00	\$225.00

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Moonachie, NJ 07074

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Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Mar 6, 2020

Invoice Num: 2020-2475

Billing Through: Feb 29, 2020

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

Date	Employee	Description	Hours	Rate	Amount
2/28/2020	RM	Billable Time E-mails and phone calls with David Corrigan, Esq. regarding depositions in tenure hearings for next week, witnesses in tenure hearings and potentiality new evidence.	1.50	\$150.00	\$225.00
2/28/2020	MG	Billable Time Email to JIF attorney regarding need for documents; reviewed and compiled all documents from tenure case to be produced in civil rights case.	4.00	\$150.00	\$600.00

Total Service Amount: **\$6,487.50**

Amount Due This Invoice: **\$6,487.50**

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2020-2430	2/5/2020	\$17,287.86	\$467.50	\$17,287.86

Total Amount Due Including This Invoice: **\$23,775.36**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Mar 6, 2020

Invoice Num: 2020-2484

Billing Through: Feb 29, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
2/2/2020	MG	Billable Time Finished draft responses to interrogatories.	2.00	\$150.00	\$300.00
2/3/2020	MG	Billable Time Reviewed file for additional information needed to answer discovery.	1.50	\$150.00	\$225.00
2/4/2020	MG	Billable Time Reviewed file for additional information on water service to property; researched borough's knowledge of projects done by KC ; email to administrator regarding requesting information.	2.50	\$150.00	\$375.00
2/5/2020	MG	Billable Time Research on whether municipalities can accept gifts; meeting Borough Administrator to obtain documents; scanned, redacted and reviewed new documents.	8.00	\$150.00	\$1,200.00
2/5/2020	LS	Billable Time email with Hector Olmo re discovery responses	0.50	\$150.00	\$75.00
2/6/2020	MG	Billable Time Completed upload of all documents; adjusted answers to notice to produce accordingly.	3.50	\$150.00	\$525.00
2/10/2020	MG	Billable Time Revisions to Answers to Interrogatories as per Richard Malagiere edits.	2.50	\$150.00	\$375.00
2/14/2020	MG	Billable Time Additions to discovery from new documents provided by Leonard Seaman.	1.00	\$150.00	\$150.00
2/16/2020	MG	Billable Time Reviewed additional documents provided by Leonard Seaman; updated and review all discovery response for final submission to opposition.	4.00	\$150.00	\$600.00
2/17/2020	MG	Billable Time Reviewed submission with Richard Malagiere; revised accordingly.	1.50	\$150.00	\$225.00
2/17/2020	LS	Billable Time receipt of discovery end date notice	0.25	\$150.00	\$37.50
2/19/2020	MG	Billable Time Email with labor counsel seeking responsive documents.	0.25	\$150.00	\$37.50

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Moonachie, NJ 07074
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Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Mar 6, 2020
Invoice Num: 2020-2484
Billing Through: Feb 29, 2020

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

Date	Employee	Description	Hours	Rate	Amount
2/19/2020	LS	Billable Time review of draft answers to interrogatories and document production	1.00	\$150.00	\$150.00
2/19/2020	LS	Billable Time email to Corrigan re deposition transcript	0.25	\$150.00	\$37.50
2/20/2020	LS	Billable Time receipt of Cassidy transcript from Corrigan	1.50	\$150.00	\$225.00
2/24/2020	LS	Billable Time letter from counsel for plaintiff re offer to clean property	0.25	\$150.00	\$37.50
2/24/2020	LS	Billable Time letter to counsel for plaintiff re response to offer to clean property	0.50	\$150.00	\$75.00
2/28/2020	MG	Billable Time Reviewed Tort Claims Notice served upon Wallington by counsel for KC landscaping.	0.50	\$150.00	\$75.00
2/28/2020	LS	Billable Time receipt of notice of tort claim filed by defendant	0.50	\$150.00	\$75.00
2/28/2020	LS	Billable Time email to client re notice of tort claim	0.50	\$150.00	\$75.00

Total Service Amount: **\$4,875.00**

Reimbursable Expenses:

Date	Employee	Description	Amount
2/5/2020	Lexis Nexis	Lexis Nexis Legal Research	\$204.00

Total Expenses: **\$204.00**

Amount Due This Invoice: **\$5,079.00**

Account Summary

Ref. Received	Ref. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2020-2442	2/5/2020	\$5,722.50	\$1,812.50	\$5,722.50

Total Amount Due Including This Invoice: **\$10,801.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Feb 5, 2020

Invoice Num: 2020-2461

Billing Through: Jan 31, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/2/2020	LS	Billable Time receipt and review sur-reply brief by plaintiff	0.50	\$150.00	\$75.00
1/2/2020	LS	Billable Time telephone call with counsel for plaintiff re adjournment request	0.25	\$150.00	\$37.50
1/2/2020	LS	Billable Time letter from plaintiff's attorney re adjournment request	0.25	\$150.00	\$37.50
1/6/2020	LS	Billable Time prepare reply brief re motion for reconsideration	2.50	\$150.00	\$375.00
1/6/2020	LS	Billable Time email to Hector Olmo re reply brief	0.25	\$150.00	\$37.50
1/6/2020	LS	Billable Time legal research (LEXIS and GANN) re certification of interloquatory orders for appeal for reply brief	1.50	\$150.00	\$225.00
1/23/2020	LS	Billable Time review of file in preparation for oral argument on motion for reconsideration	0.75	\$150.00	\$112.50
1/23/2020	RM	Billable Time Legal research and prepare for oral argument on motion for reconsideration.	4.50	\$150.00	\$675.00
1/24/2020	LS	Billable Time attend court for oral argument on motion for reconsideration	1.50	\$150.00	\$225.00
1/24/2020	RM	Billable Time Prepare for and attend oral argument on motion for reconsideration of judges finding that the complaint was not barred by the 45 day period in which to sue.	4.00	\$150.00	\$600.00
1/27/2020	LS	Billable Time receipt and review of order re motion to reconsider	0.50	\$150.00	\$75.00
1/30/2020	LS	Billable Time legal research (Gann) re objection to form of order and submission pursuant to 5 day rule, prepare letter to court re form of order re summary judgment and need to dismiss entire case	2.00	\$150.00	\$300.00

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Moonachie, NJ 07074
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Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Feb 5, 2020
Invoice Num: 2020-2461
Billing Through: Jan 31, 2020

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/30/2020	MG	Billable Time Research regarding whether spot zoning could result in monetary damages.	1.50	\$150.00	\$225.00
1/31/2020	LS	Billable Time letter from counsel for plaintiff re form of order	0.25	\$150.00	\$37.50
1/31/2020	MG	Billable Time Reviewed letter from Marc Liebman; reviewed all documentation related to his letter; drafted response letter.	2.50	\$150.00	\$375.00

Total Service Amount: **\$3,412.50**

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
1/6/2020	Lexis Nexis	Lexis Nexis Legal Research	\$120.00
1/23/2020	Lexis Nexis	Lexis Nexis Legal Research	\$375.00
1/30/2020	Lexis Nexis	Lexis Nexis Legal Research	\$150.00

Total Expenses: **\$645.00**

Amount Due This Invoice: **\$4,057.50**

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2380	12/6/2019	\$3,743.00	\$3,743.00	\$0.00

Total Amount Due Including This Invoice: **\$4,057.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Feb 5, 2020

Invoice Num: 2020-2430

Billing Through: Jan 31, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/2/2020	LS	Billable Time	0.25	\$150.00	\$37.50
		email with counsel re deposition of Baginski			
1/6/2020	LS	Billable Time	0.25	\$150.00	\$37.50
		email with defense counsel re submission for settlement conference			
1/6/2020	LS	Billable Time	1.00	\$150.00	\$150.00
		review of draft settlement memo from co-counsel for Borough			
1/6/2020	LS	Billable Time	1.00	\$150.00	\$150.00
		review of settlement memo by counsel for council members			
1/6/2020	LS	Billable Time	0.75	\$150.00	\$112.50
		review of settlement memo from counsel for Police			
1/7/2020	LS	Billable Time	0.25	\$150.00	\$37.50
		email to counsel for Police re settlement memo			
1/7/2020	LS	Billable Time	0.25	\$150.00	\$37.50
		email to counsel for council members re settlement memo			
1/7/2020	LS	Billable Time	1.00	\$150.00	\$150.00
		review of amended complaint and analysis re settlement memo to court			
1/7/2020	LS	Billable Time	2.00	\$150.00	\$300.00
		prepare settlement memo to court			
1/7/2020	RM	Billable Time	5.00	\$150.00	\$750.00
		Attend plaintiff's deposition.			
1/8/2020	LS	Billable Time	0.25	\$150.00	\$37.50
		email with counsel re Police deposition			
1/9/2020	LS	Billable Time	3.00	\$150.00	\$450.00
		legal research re 1983 retaliation claim for political association with speech			
1/9/2020	LS	Billable Time	4.00	\$150.00	\$600.00
		file review in preparation for settlement conference			
1/9/2020	LS	Billable Time	0.50	\$150.00	\$75.00
		review of rulings by GRC re OPRA violations			
1/10/2020	LS	Billable Time	4.00	\$150.00	\$600.00
		attend court for settlement conference, travel/from Newark, NJ for same			

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Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Feb 5, 2020

Invoice Num: 2020-2430

Billing Through: Jan 31, 2020

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/10/2020	LS	Billable Time notice from court re discovery dates and settlement conference	0.25	\$150.00	\$37.50
1/10/2020	LS	Billable Time email to Hector Olmo re insurance policy	0.25	\$150.00	\$37.50
1/10/2020	LS	Billable Time memo to file re settlement conference	0.50	\$150.00	\$75.00
1/10/2020	RM	Billable Time Attend deposition of Baginsky.	5.00	\$150.00	\$750.00
1/11/2020	LS	Billable Time research re LAD claim for hypertension/untreated anxiety	3.50	\$150.00	\$525.00
1/11/2020	LS	Billable Time legal research elements of proof re NJ Civil Rights Acts claims by plaintiff	5.50	\$150.00	\$825.00
1/12/2020	LS	Billable Time legal research re FMLA claim and damages for same for analysis of plaintiff's claims	4.00	\$150.00	\$600.00
1/13/2020	LS	Billable Time letter to plaintiff's attorney re retainer agreements and medical records	0.50	\$150.00	\$75.00
1/13/2020	LS	Billable Time email to Borough co-counsel re discovery	0.25	\$150.00	\$37.50
1/13/2020	LS	Billable Time email to client re requests for discovery	0.25	\$150.00	\$37.50
1/13/2020	LS	Billable Time email to Hector Olmo re reservation of rights letters from carrier	0.25	\$150.00	\$37.50
1/13/2020	LS	Billable Time legal research re 1983 claim based on violation of right to privacy re analysis of plaintiff's claims	4.50	\$150.00	\$675.00
1/13/2020	LS	Billable Time legal research re CEPA claim and standard for falsification of document related to same for analysis of plaintiff's claims	3.00	\$150.00	\$450.00

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Invoice

Invoice Date: Feb 5, 2020

Invoice Num: 2020-2430

Billing Through: Jan 31, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/13/2020	MG	Billable Time Reviewed social media to obtain pictures of Baginski to refute claims of depression despondence.	1.00	\$150.00	\$150.00
1/14/2020	LS	Billable Time review of reservation of rights issued by carrier	1.00	\$150.00	\$150.00
1/14/2020	LS	Billable Time review of resignation of tax collector for service in discovery	0.25	\$150.00	\$37.50
1/14/2020	LS	Billable Time letter to Summit Risk re settlement position	0.75	\$150.00	\$112.50
1/14/2020	LS	Billable Time telephone call with Ben Schulman re settlement position	0.25	\$150.00	\$37.50
1/14/2020	LS	Billable Time email with counsel for Polce re deposition	0.25	\$150.00	\$37.50
1/14/2020	LS	Billable Time file review in preparation for Polce deposition	1.50	\$150.00	\$225.00
1/15/2020	LS	Billable Time letter from Corrigan re supplemental discovery related to OPRA decisions against Borough	0.50	\$150.00	\$75.00
1/15/2020	LS	Billable Time review of Borough insurance policies re coverage issues related to claims	1.50	\$150.00	\$225.00
1/15/2020	LS	Billable Time attend deposition of Victor Polce	5.50	\$150.00	\$825.00
1/16/2020	LS	Billable Time receipt of link to prior discovery materials, download same, and forward for reproduction	0.25	\$150.00	\$37.50
1/16/2020	LS	Billable Time email with Tandy re depositions	0.25	\$150.00	\$37.50
1/17/2020	LS	Billable Time email with Selagy re deposition preparation	0.25	\$150.00	\$37.50
1/17/2020	LS	Billable Time email with counsel re dates for defendant depositions	0.50	\$150.00	\$75.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Feb 5, 2020

Invoice Num: 2020-2430

Billing Through: Jan 31, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Baginski v. Wallington (Baginski v. Wallington 1088-12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/17/2020	LS	Billable Time review of discovery conducted prior to entry into case for analysis of strength of plaintiff's claims against Borough and related issues	5.75	\$150.00	\$862.50
1/20/2020	LS	Billable Time email from Selagy re Polce deposition exhibits	0.25	\$150.00	\$37.50
1/20/2020	LS	Billable Time receipt and review of Polce deposition exhibits	0.50	\$150.00	\$75.00
1/20/2020	LS	Billable Time letter from Corrigan re Olakowski deposition	0.25	\$150.00	\$37.50
1/20/2020	LS	Billable Time letter from Tandy re motion to amend claims and/or disqualify counsel	0.50	\$150.00	\$75.00
1/20/2020	LS	Billable Time legal research re claims for first amendment association retaliation with a view toward claims by high level decision makers/acotrs of entity	6.50	\$150.00	\$975.00
1/21/2020	LS	Billable Time legal research re conflict of interest rules re attorney trial witness issues	1.50	\$150.00	\$225.00
1/21/2020	LS	Billable Time letter to court re potential motion to amend/disqualify	1.00	\$150.00	\$150.00
1/21/2020	LS	Billable Time email to client re opposition to plaintiff's letter re amend/disqualify	0.25	\$150.00	\$37.50
1/21/2020	MG	Billable Time Assisted Leonard Seaman with obtaining documentation related to disqualification claim	0.50	\$150.00	\$75.00
1/22/2020	MG	Billable Time Work on reviewing social media and other internet searches to find proof of Bagainski not being "despondent".	0.50	\$150.00	\$75.00
1/24/2020	LS	Billable Time review of discovery provided by co-counsel re documents, discovery responses, and rule 26 disclosures prior to entry into matter	4.50	\$150.00	\$675.00

The Law Offices of Richard Malagiere

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Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Feb 5, 2020

Invoice Num: 2020-2430

Billing Through: Jan 31, 2020

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/24/2020	MG	Billable Time Reviewed email from Baginski regarding fire clothing stipend; investigated matter and drafted report.	2.50	\$150.00	\$375.00
1/26/2020	LS	Billable Time continued legal research (LEXIS) re first amendment association claims	4.50	\$150.00	\$675.00
1/27/2020	LS	Billable Time letter to Tandy re amendment of Rule 26 disclosures	0.50	\$150.00	\$75.00
1/28/2020	LS	Billable Time email with counsel re Olkowski dep prep	0.50	\$150.00	\$75.00
1/30/2020	RM	Billable Time Identify former borough employee now working for Felician College with knowledge of case and tenure hearing that may be helpful in defending action; e-mails and telecoms with attorneys and elected officials regarding same. Attempt to contact her and direct attorneys to disclose her.	2.00	\$150.00	\$300.00
1/30/2020	LS	Billable Time meeting with Bryan Olkowski, Scott Selagy, and David Corrigan to prepare for deposition	4.00	\$150.00	\$600.00
1/30/2020	LS	Billable Time email to Corrigan re recent Rule 26 amendment	0.25	\$150.00	\$37.50
1/31/2020	LS	Billable Time attend deposition of Bryan Olkowski	8.00	\$150.00	\$1,200.00

Total Service Amount: **\$16,387.50**

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
1/9/2020	Lexis Nexis	Lexis Nexis Legal Research	\$84.00
1/10/2020	LS	Travel Expense Parking in Newark for settlement conference	\$20.00
1/10/2020	Lexis Nexis	Lexis Nexis Legal Research	\$39.00
1/13/2020	Lexis Nexis	Lexis Nexis Legal Research	\$120.00

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Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Feb 5, 2020

Invoice Num: 2020-2430

Billing Through: Jan 31, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Reimbursable Expenses:

Date	Employee	Description	Amount
1/17/2020	Blue Dog Graphics	Blue Dog Graphics	\$357.36
		Invoice # 54355 B/W copies printout from 21 different files.	
1/20/2020	Lexis Nexis	Lexis Nexis	\$150.00
		Legal Research	
1/26/2020	Lexis Nexis	Lexis Nexis	\$130.00
		Legal Research	

Total Expenses: **\$900.36**

Amount Due This Invoice: **\$17,287.86**

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2397	1/8/2020	\$467.50	\$2,146.50	\$467.50

Total Amount Due Including This Invoice: **\$17,755.36**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Feb 5, 2020

Invoice Num: 2020-2442

Billing Through: Jan 31, 2020

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM,

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/5/2020	LS	Billable Time legal research (LEXIS) re contract claims act and notice required for tort claim counterclaim for motion to dismiss	2.00	\$150.00	\$300.00
1/7/2020	LS	Billable Time prepare certification of Hector Olmo re motion to dismiss	0.50	\$150.00	\$75.00
1/7/2020	LS	Billable Time email to Hector Olmo re certification	0.25	\$150.00	\$37.50
1/8/2020	LS	Billable Time prepare notice of motion to dismiss	0.50	\$150.00	\$75.00
1/8/2020	LS	Billable Time prepare certification of counsel re motion to dismiss	0.50	\$150.00	\$75.00
1/8/2020	LS	Billable Time prepare form of order re motion to dismiss	0.25	\$150.00	\$37.50
1/8/2020	LS	Billable Time prepare brief in support of motion to dismiss	4.50	\$150.00	\$675.00
1/8/2020	LS	Billable Time email to client re motion to dismiss	0.25	\$150.00	\$37.50
1/16/2020	LS	Billable Time receipt and review of opposition to motion to dismiss by KC's.	2.00	\$150.00	\$300.00
1/16/2020	LS	Billable Time legal research (Gann) re opposition to motion to dismiss re scope of TCA and allowance for late notice of claim	3.00	\$150.00	\$450.00
1/21/2020	LS	Billable Time telephone call with court re oral argument on motion to dismiss	0.25	\$150.00	\$37.50
1/21/2020	LS	Billable Time letter to court re oral argument on motion to dismiss	0.25	\$150.00	\$37.50
1/21/2020	LS	Billable Time prepare letter brief in support of motion to dismiss tort claims	4.25	\$150.00	\$637.50
1/21/2020	LS	Billable Time email to client re opposition and rely to motion to dismiss tort claims	0.25	\$150.00	\$37.50

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Moonachie, NJ 07074

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Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Feb 5, 2020

Invoice Num: 2020-2442

Billing Through: Jan 31, 2020

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

Date	Employee	Description	Hours	Rate	Amount
1/23/2020	LS	Billable Time review of file in preparation for oral argument on motion to dismiss	3.50	\$150.00	\$525.00
1/24/2020	LS	Billable Time attend court for oral argument on motion to dismiss	1.50	\$150.00	\$225.00
1/24/2020	LS	Billable Time receipt of order denying motion to dismiss	0.25	\$150.00	\$37.50
1/24/2020	MG	Billable Time Began work on answering interrogatories.	2.00	\$150.00	\$300.00
1/27/2020	MG	Billable Time Work on answering KC Landscaping discovery requests.	2.50	\$150.00	\$375.00
1/30/2020	MG	Billable Time Work on answering interrogatories and assembling documents requested.	3.75	\$150.00	\$562.50
1/31/2020	MG	Billable Time Work on completing draft answers to interrogatories.	4.50	\$150.00	\$675.00
Total Service Amount:					\$5,512.50

Reimbursable Expenses:

Date	Employee	Description	Amount
1/5/2020	Lexis Nexis	Lexis Nexis Legal Research	\$160.00
1/8/2020	Treas St of NJ	filing fee filing fee for filing of Motion for Dismissal	\$50.00

Total Expenses: \$210.00

Amount Due This Invoice: \$5,722.50

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2403	1/8/2020	\$1,812.50	\$1,057.00	\$1,812.50

Total Amount Due Including This Invoice: \$7,535.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Feb 5, 2020

Invoice Num: 2020-2463

Billing Through: Jan 31, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Victor Polce v Wallington 1088.07 (Victor Polce v Wallington 1088.07:) - Managed by (RM)

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
1/30/2020	Court Reporter	Court Reporter	\$538.70

Invoice#570510 Transcript of Victor Polce

Total Expenses: \$538.70

Amount Due This Invoice: \$538.70

Account Summary

<u>Ret. Received</u>	<u>Ret. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-2419	1/8/2020	\$220.00	\$902.50	\$220.00

Total Amount Due Including This Invoice: \$758.70

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Feb 5, 2020

Invoice Num: 2020-2437

Billing Through: Jan 31, 2020

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Fehl v. Wallington (Fehl v. Wallington 1088.15:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/29/2020	RM	Billable Time Analyze PACER filings to determine s/j motion opportunities for Borough and Borough employees; e-mails to co-counsel and associates regarding same; review plaintiff's expert report and Borough's report.	3.00	\$150.00	\$450.00
1/29/2020	LS	Billable Time telephone call to JIF counsel re pretrial order	0.25	\$150.00	\$37.50
1/30/2020	RM	Billable Time Research into Borough liability under Monell case and its progeny for policy and practice allegations; e-mail to JIIF assigned counsel regarding same.	2.50	\$150.00	\$375.00

Total Service Amount: **\$862.50**

Amount Due This Invoice: **\$862.50**

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2187	8/9/2019	\$82.50	\$82.50	\$0.00

Total Amount Due Including This Invoice: **\$862.50**

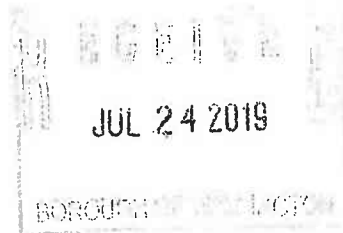
The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: 201-440-0675 Fax: 201-440-1843

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057



Invoice

Invoice Date: Jul 10, 2019

Invoice Num: 2019-2161

Billing Through: Jun 30, 2019

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -

Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/2/2019	LS	Billable Time legal research re use of deliberative process privilege to oppose depositions of council members	3.00	\$110.00	\$330.00
6/2/2019	LS	Billable Time legal research re scope of discovery in prerogative writ actions to limit depositions of council members	2.25	\$110.00	\$247.50
6/4/2019	MG	Billable Time Continued work on handling discovery deficiency issues.	0.50	\$110.00	\$55.00
6/5/2019	MG	Billable Time E-mails with council about interrogatories.	0.25	\$110.00	\$27.50
6/5/2019	RM	Billable Time Review letter requesting more specific answers to interrogatories; conference with MG, Esq. regarding same; e-mail to Mayor and Council regarding same.	1.00	\$110.00	\$110.00
6/6/2019	MG	Billable Time E-mail with Martin Kafarian regarding deposition dated; work on file organization.	1.00	\$110.00	\$110.00
6/10/2019	LS	Billable Time legal research re discovery of deliberative process of council members for motion to quash subpoena	3.00	\$110.00	\$330.00
6/10/2019	LS	Billable Time prepare notice of motion for protective order	0.50	\$110.00	\$55.00
6/10/2019	LS	Billable Time prepare form of order for protective order	0.50	\$110.00	\$55.00
6/10/2019	LS	Billable Time prepare certification and exhibits re protective order	0.75	\$110.00	\$82.50
6/10/2019	LS	Billable Time prepare brief in support of motion for protective order	3.00	\$110.00	\$330.00
6/11/2019	MG	Billable Time Delivered courtesy copy to Judge Farrington of Motion for Protective Order.	1.00	\$110.00	No Charge
6/12/2019	MG	Billable Time Revised deficiency letter responses after receiving additional information.	1.00	\$110.00	\$110.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Jul 10, 2019

Invoice Num: 2019-2161

Billing Through: Jun 30, 2019

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/14/2019	MG	Billable Time	0.25	\$110.00	\$27.50
		Work related to scheduling depositions.			
6/14/2019	MG	Billable Time	0.25	\$110.00	\$27.50
		E-mail to Paul Elias regarding settlements.			
6/16/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		amend notice of motion			
6/16/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		amend form of order			
6/16/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		letter to court re amendments to notice of motion and form of order			
6/17/2019	MG	Billable Time	0.25	\$110.00	\$27.50
		E-mails with opposing counsel regarding deposition dates for zone code official.			
6/27/2019	MG	Billable Time	0.25	\$110.00	\$27.50
		E-mail with tax appeal counsel regarding authorization to dismiss.			
6/28/2019	MG	Billable Time	4.00	\$110.00	\$440.00
		Reviewed letter submitted by Plaintiff; took action related to letter including obtaining documents; drafted response letter.			

Total Service Amount: \$2,475.00

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
6/9/2019	Lexis Nexis	Lexis Nexis	\$123.00
		Legal Research	
6/10/2019	Lexis Nexis	Lexis Nexis	\$24.00
		Legal Research	
6/10/2019	Treas St of NJ	filing fee	\$50.00
		Fee for filing of Motion	

Total Expenses: \$197.00

Discount Applied: (\$357.50)

Amount Due This Invoice: \$2,314.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Invoice Date: Jul 10, 2019

Invoice Num: 2019-2161

Billing Through: Jun 30, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -

Managed by (RM)

CREDIT REVERSING CHARGE of 4/30/2019. 3.25 HOURS, INADVERTENT DOUBLE ENTRY.

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2108	6/12/2019	\$3,437.50	\$3,437.50	\$0.00

Total Amount Due Including This Invoice: \$2,314.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Jul 10, 2019

Invoice Num: 2019-2135

Billing Through: Jun 30, 2019

Fehl v. Wallington (Fehl v. Wallington 1088.15:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/3/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		order from court re discovery motion by plaintiff			
6/11/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		Review letter from plaintiff's attorney to Corrigan re subpoena			
6/13/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		receipt and review plaintiff's motion to compel discovery			
6/14/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		notice of dismissal re BCPO			
6/18/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		notice from court re discovery schedule			
6/18/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		order of dismissal of BCPO			
6/20/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from Corrigan re subpoena from plaintiff			

Total Service Amount: **\$220.00**

Amount Due This Invoice: **\$220.00**

Account Summary

<u>Ret. Received</u>	<u>Ret. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-2086	6/12/2019	\$1,292.50	\$1,292.50	\$0.00

Total Amount Due Including This Invoice: **\$220.00**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102
Moonachie, NJ 07074
Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Jul 10, 2019
Invoice Num: 2019-2143
Billing Through: Jun 30, 2019

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/3/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to court re courtesy copy of opposition to OTSC and revised position on water shut off statutes			
6/3/2019	LS	Billable Time	1.00	\$110.00	\$110.00
		receipt and review of reply brief re OTSC from defendant			
6/7/2019	LS	Billable Time	2.50	\$110.00	\$275.00
		attend court for hearing on OTSC/travel to-from Hackensack for same			
6/7/2019	LS	Billable Time	2.00	\$110.00	\$220.00
		file review in preparation for OTSC			
6/11/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from client re water restoration issues			
6/11/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to counsel for KC re water restoration			
6/12/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		letter from counsel for KC re water issues and service of complaint			
6/12/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to counsel for KC re water restoration			
6/12/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to counsel for KC re service of complaint			
6/13/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email from client re PVWC water restoration			
6/13/2019	LS	Billable Time	2.50	\$110.00	\$275.00
		receipt and review of KC opposition to motion			
6/14/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to counsel for KC re water restoration			
6/14/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to counsel for KC re inspection of old water meter			
6/17/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		legal research re general v special appearance in matter			
6/17/2019	LS	Billable Time	4.50	\$110.00	\$495.00
		prepare letter brief in support of motion to proceed in a summary fashion			

The Law Offices of Richard Malagiere

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Moonachie, NJ 07074
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Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Jul 10, 2019
Invoice Num: 2019-2143
Billing Through: Jun 30, 2019

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/20/2019	LS	Billable Time telephone call with counsel for defendant re return date of motion for summary trial	0.50	\$110.00	\$55.00
6/21/2019	LS	Billable Time letter to court re return date of motion	0.50	\$110.00	\$55.00
Total Service Amount:					\$2,090.00

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
6/1/2019	Guaranteed Subpoena Service Inc.	Fee Service	\$65.00
6/12/2019	Lexis Nexis	5/2/19: Delivery of Letter to Kurt Cassidy. Lexis Nexis Legal Research	\$123.00
6/17/2019	Lexis Nexis	Lexis Nexis Legal Research	\$75.00
Total Expenses:			\$263.00
Amount Due This Invoice:			\$2,353.00

Account Summary

<u>Ref. Received</u>	<u>Ref. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-2093	6/12/2019	\$9,810.65	\$9,810.65	\$0.00

Total Amount Due Including This Invoice: **\$2,353.00**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Jul 10, 2019

Invoice Num: 2019-2127

Billing Through: Jun 30, 2019

Baginski v. Wallington (Baginski v. Wallington 1088.12;) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/4/2019	LS	Billable Time email with counsel for defendant re discovery from plaintiff and mediation of case	0.25	\$110.00	\$27.50
6/6/2019	MG	Billable Time E-mails with labor counsel regarding document production.	0.25	\$110.00	\$27.50
6/7/2019	MG	Billable Time Work on assembly documents for labor counsel.	2.25	\$110.00	\$247.50

Total Service Amount: **\$302.50**

Discount Applied: (\$137.50)

Amount Due This Invoice: **\$165.00**

CREDIT REVERSING CHARGE of 4/29/2019. 1.25 HOURS, INADVERTENT DOUBLE ENTRY.

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2074	6/12/2019	\$1,616.15	\$1,616.15	\$0.00

Total Amount Due Including This Invoice: **\$165.00**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Jan 8, 2020
Invoice Num: 2019-2397
Billing Through: Dec 31, 2019

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/3/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		receipt of notice of deposition for Baginski			
12/11/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letters from Corrigan to ALJ re status			
12/13/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from co-counsel re Baginski deposition			
12/18/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from Selagi re Baginski deposition			
12/18/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email with counsel for Borough (JIF) re deposition			
		scheduling and discovery dates			
12/20/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email with Selagay re discovery schedule			
12/20/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		letter to court from co-defendant re joint request for			
		discovery extension			
12/26/2019	LS	Billable Time	2.00	\$110.00	\$220.00
		review and analyze Baginski medical records			
		obtained by co-counsel			
12/27/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		order from court extending discovery			

Total Service Amount: \$467.50

Amount Due This Invoice: \$467.50

Account Summary

<u>Ref. Received</u>	<u>Ref. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-2354	12/6/2019	\$2,146.50	\$2,146.50	\$0.00

Total Amount Due Including This Invoice: \$467.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Jan 8, 2020

Invoice Num: 2019-2403

Billing Through: Dec 31, 2019

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

Date	Employee	Description	Hours	Rate	Amount
12/1/2019	LS	Billable Time legal research (Gann) re standards for dismissal of tort and contract claims for failure to file a notice of claim	4.00	\$110.00	\$440.00
12/2/2019	LS	Billable Time email with client re KC's status on property	0.25	\$110.00	\$27.50
12/2/2019	LS	Billable Time telephone call with client re KC's status on property	0.25	\$110.00	\$27.50
12/4/2019	LS	Billable Time letter to court re mootness of request for warrant of removal	0.50	\$110.00	\$55.00
12/4/2019	LS	Billable Time email to SCP officer re warrant of removal	0.25	\$110.00	\$27.50
12/4/2019	LS	Billable Time email to Hector Olmo re withdrawal of request for warrant of removal	0.25	\$110.00	\$27.50
12/5/2019	LS	Billable Time review of abandoned property statute re Borough obligations re tress left at property	1.00	\$110.00	\$110.00
12/5/2019	LS	Billable Time letter to counsel for KC's re tress left at property	0.50	\$110.00	\$55.00
12/5/2019	LS	Billable Time letter from counsel for KC re removal of trash from site	0.25	\$110.00	\$27.50
12/30/2019	LS	Billable Time Legal research (GANN) re claim notice requirements for tort and contract based claims	3.50	\$110.00	\$385.00
12/31/2019	LS	Billable Time prepare notice of motion, brief, certification of counsel, and from of order re motion to dismiss tort portions of counterclaim for failure to file notice of tort claim	4.50	\$110.00	\$495.00

Total Service Amount: \$1,677.50

Reimbursable Expenses:

Date	Employee	Description	Amount
12/4/2019	Lexis Nexis	Lexis Nexis Legal Research	\$135.00

Total Expenses: \$135.00

Amount Due This Invoice: \$1,812.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Jan 8, 2020

Invoice Num: 2019-2403

Billing Through: Dec 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2365	12/6/2019	\$1,057.00	\$1,057.00	\$0.00

Total Amount Due Including This Invoice: **\$1,812.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102
Moonachie, NJ 07074
Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Jan 8, 2020
Invoice Num: 2019-2419
Billing Through: Dec 31, 2019

Victor Polce v Wallington 1088.07 (Victor Polce v Wallington 1088.07:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/5/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email with counsel for plaintiff re settlement agreement			
12/5/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to court re adjournment of motion			
12/6/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		receipt of signed settlement agreement from Polce			
12/6/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email to Olmo re settlement agreement and countersignature of same			
12/19/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to court withdrawing motion for fees			

Total Service Amount: **\$220.00**

Amount Due This Invoice: **\$220.00**

Account Summary

<u>Ref. Received</u>	<u>Ref. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-2382	12/6/2019	\$902.50	\$902.50	\$0.00

Total Amount Due Including This Invoice: **\$220.00**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Nov 8, 2019

Invoice Num: 2019-2322

Billing Through: Oct 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

Date	Employee	Description	Hours	Rate	Amount
10/1/2019	MG	Billable Time Research regarding tort claims act notice for counterclaim for use on motion to dismiss.	2.75	\$110.00	\$302.50
10/2/2019	MG	Billable Time Continued work on formulating argument for Motion to Dismiss counterclaim.	1.75	\$110.00	\$192.50
10/3/2019	LS	Billable Time review and analysis of transcript of deposition of Cassidy in Baginski tenure action, prepare notes for further examination	2.00	\$110.00	\$220.00
10/3/2019	LS	Billable Time review and analysis of transcript of Baginski deposition in tenure case	3.00	\$110.00	\$330.00
10/4/2019	MG	Billable Time Work on motion to dismiss counterclaim for Tort Claim Act violations.	2.00	\$110.00	\$220.00

Total Service Amount: **\$1,265.00**

Amount Due This Invoice: **\$1,265.00**

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2277	10/4/2019	\$1,543.00	\$2,562.50	\$9,453.50

Total Amount Due Including This Invoice: **\$10,718.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Nov 8, 2019

Invoice Num: 2019-2340

Billing Through: Oct 31, 2019

Victor Polce v Wallington 1088.07 (Victor Polce v Wallington 1088.07:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/16/2019	LS	Billable Time receipt and review of order and opinion re motion to dismiss and motion for summary judgment	1.00	\$110.00	\$110.00
10/16/2019	LS	Billable Time email with client re outcome of motions	0.50	\$110.00	\$55.00

Total Service Amount: \$165.00

Amount Due This Invoice: \$165.00

Account Summary

<u>Ret. Received</u>	<u>Ret. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-2210	8/9/2019	\$27.50	\$27.50	\$0.00

Total Amount Due Including This Invoice: \$165.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Nov 8, 2019

Invoice Num: 2019-2338

Billing Through: Oct 31, 2019

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/2/2019	LS	Billable Time prepare appendix in support of motion for leave to appeal order compelling depositions.	4.50	\$110.00	\$495.00
10/4/2019	MG	Billable Time Reviewed appellate brief for any issues.	0.50	\$110.00	\$55.00
10/4/2019	LS	Billable Time prepare notice of motion for leave to appeal	0.50	\$110.00	\$55.00
10/4/2019	LS	Billable Time prepare transcript request	0.50	\$110.00	\$55.00
10/4/2019	LS	Billable Time prepare proof of service re motion for leave to appeal	0.25	\$110.00	\$27.50
10/4/2019	LS	Billable Time prepare brief in support of motion for leave to appeal	8.00	\$110.00	\$880.00
10/4/2019	LS	Billable Time email to client re motion for leave to appeal	0.50	\$110.00	\$55.00
10/4/2019	LS	Billable Time legal research re motion for leave to appeal standard for granting motion and time frame for application	2.50	\$110.00	\$275.00
10/4/2019	LS	Billable Time letter to appellate division re timeliness of motion for leave to appeal	0.50	\$110.00	\$55.00
10/5/2019	RM	Billable Time E-mail to planning board attorney regarding pending land use application for Dokka property.	0.50	\$110.00	\$55.00
10/7/2019	LS	Billable Time review of motion for summary judgment and analysis of arguments related thereto	4.50	\$110.00	\$495.00
10/7/2019	LS	Billable Time review and edit re brief in opposition to motion for summary judgment by plaintiff re ordinance	3.00	\$110.00	\$330.00
10/7/2019	MG	Billable Time Emails related to issuing a deposition to Doka employee Michael Lagace.	0.25	\$110.00	\$27.50
10/8/2019	MG	Billable Time Email related to motion for leave to appeal.	0.25	\$110.00	\$27.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Nov 8, 2019

Invoice Num: 2019-2338

Billing Through: Oct 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/8/2019	MG	Billable Time Email with opposing counsel regarding adjournment request.	0.25	\$110.00	\$27.50
10/10/2019	MG	Billable Time Research and work on cross-motion for summary judgment for complaint being time barred.	6.50	\$110.00	\$715.00
10/10/2019	LS	Billable Time review and analysis of plaintiff's brief in support of motion for summary judgment for preparation of opposition thereto	4.50	\$110.00	\$495.00
10/11/2019	MG	Billable Time Work on opposition to summary judgment and cross-motion.	5.00	\$110.00	\$550.00
10/11/2019	LS	Billable Time review and edit brief in opposition to motion for summary judgment by plaintiff, review response to statement of material facts not in dispute, research re case law and statutes relevant to arguments	8.00	\$110.00	\$880.00
10/14/2019	MG	Billable Time Emails with intervenor counsel regarding motion strategy; drafted opposition to material statement of facts; work on completing brief.	5.00	\$110.00	\$550.00
10/14/2019	LS	Billable Time review, edit, and finalize brief points re cross-motion for summary judgment	3.50	\$110.00	\$385.00
10/15/2019	MG	Billable Time Work on completing opposition to summary judgment/cross motion for summary judgment.	6.50	\$110.00	\$715.00
10/15/2019	LS	Billable Time finalize opposition and cross-motion brief for filing	2.25	\$110.00	\$247.50
10/17/2019	MG	Billable Time Email with opposing counsel regarding documents from cross-motion submission.	0.25	\$110.00	\$27.50
10/17/2019	LS	Billable Time receipt and review of notice of deposition of Bridgett Bogart	0.25	\$110.00	\$27.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Nov 8, 2019

Invoice Num: 2019-2338

Billing Through: Oct 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/22/2019	MG	Billable Time Reviewed correspondence sent by opposing counsel regarding expert reports; reviewed motion response and analyzed issues raised.	3.00	\$110.00	\$330.00
10/23/2019	MG	Billable Time Delivered courtesy copy of motion to Judge Farrington.	1.00	\$110.00	\$110.00
10/23/2019	LS	Billable Time notice from court re oral argument on motions	0.25	\$110.00	\$27.50
10/23/2019	LS	Billable Time review of motion papers and caselaw in preparation for oral argument on cross motion for summary judgment	3.00	\$110.00	\$330.00
10/24/2019	MG	Billable Time Review of updated discovery responses from opposition; preparation for summary judgment hearing.	3.00	\$110.00	\$330.00
10/24/2019	LS	Billable Time letter to counsel for plaintiff serving expert report	0.50	\$110.00	\$55.00
10/24/2019	LS	Billable Time email to client re service of expert report	0.25	\$110.00	\$27.50
10/24/2019	LS	Billable Time review of motion papers re motion for summary judgment and opposition to motion for summary judgment, review of relevant case law and statutes related thereto in preparation for oral argument on motions	4.50	\$110.00	\$495.00
10/24/2019	LS	Billable Time telephone call with counsel for co-defendant re motions for summary judgment	0.50	\$110.00	\$55.00
10/25/2019	MG	Billable Time Prepared for, traveled to, and attended summary judgment motion hearing.	4.00	\$110.00	\$440.00
10/25/2019	LS	Billable Time receipt of order denying motion for leave to appeal	0.25	\$110.00	\$27.50
10/25/2019	LS	Billable Time email to client re denial of motion for leave to appeal	0.50	\$110.00	\$55.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102
Moonachie, NJ 07074
Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Nov 8, 2019
Invoice Num: 2019-2338
Billing Through: Oct 31, 2019

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/25/2019	LS	Billable Time attend court for oral argument on motion for summary judgment and cross motion for summary judgment	4.00	\$110.00	\$440.00
10/25/2019	LS	Billable Time email to client re oral argument on motions	0.50	\$110.00	\$55.00
10/28/2019	MG	Billable Time Reviewed order of Judge Farrington; created memo outlining options for Borough for appeal.	2.00	\$110.00	\$220.00
10/28/2019	LS	Billable Time receipt and review of order and decision on motion for summary judgment/cross motion for summary judgment	1.00	\$110.00	\$110.00
Total Service Amount:					\$10,615.00

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
10/4/2019	Lexis Nexis	Lexis Nexis Legal Research	\$175.00
10/7/2019	LS	filing fee	\$50.00
10/15/2019	LS	filing fee to file Notice of Motion for Leave to Appeal	\$50.00
		filing fee to file Motion for Partial Summary Judgment.	\$50.00
Total Expenses:			\$275.00
Amount Due This Invoice:			\$10,890.00

Account Summary

<u>Ret. Received</u>	<u>Ret. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-2295	10/4/2019	\$7,067.50	\$1,032.50	\$7,067.50

Total Amount Due Including This Invoice: **\$17,957.00**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Nov 8, 2019

Invoice Num: 2019-2310

Billing Through: Oct 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/2/2019	LS	Billable Time letter from Corrigan to ALJ re depositions of council members	0.50	\$110.00	\$55.00
10/3/2019	MG	Billable Time Email to labor counsel regarding obtaining transcripts; reviewed deposition transcripts.	1.50	\$110.00	\$165.00
10/8/2019	LS	Billable Time letter from Corrigan re depositions of council members and protective order	0.50	\$110.00	\$55.00
10/9/2019	LS	Billable Time letter from Corrigan re deposition schedules	0.25	\$110.00	\$27.50
10/11/2019	LS	Billable Time letter from Corrigan re Olkawski deposition	0.25	\$110.00	\$27.50
10/15/2019	LS	Billable Time email with defense counsel re deposition of Baginski	0.25	\$110.00	\$27.50
10/16/2019	LS	Billable Time letter from Corrigan re submissions to ALJ	0.50	\$110.00	\$55.00
10/16/2019	RM	Billable Time Attend deposition of Baginsky in Federal Civil Rights case.	4.00	\$110.00	\$440.00
10/18/2019	LS	Billable Time email from Corrigan re suit against Baginski personally	0.00	\$110.00	\$0.00
10/22/2019	MG	Billable Time Reviewed documents sent over by labor counsel related to tenure hearing.	1.00	\$110.00	\$110.00
10/25/2019	MG	Billable Time Reviewed correspondence from labor counsel regarding tenure hearing.	0.25	\$110.00	\$27.50
10/28/2019	MG	Billable Time Reviewed correspondence and created memo regarding Baginski issues relayed by labor counsel.	1.50	\$110.00	\$165.00
10/29/2019	MG	Billable Time E-mails with labor counsel regarding summary judgment on tenure charges.	0.25	\$110.00	\$27.50

Total Service Amount: **\$1,182.50**

Amount Due This Invoice: **\$1,182.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Nov 8, 2019

Invoice Num: 2019-2310

Billing Through: Oct 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2265	10/4/2019	\$3,685.00	\$165.00	\$4,290.00

Total Amount Due Including This Invoice: \$5,472.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Oct 4, 2019

Invoice Num: 2019-2295

Billing Through: Sep 30, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02;) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/10/2019	MG	Billable Time Began review of Plaintiff's expert report.	1.50	\$110.00	\$165.00
9/12/2019	MG	Billable Time Prepared for motion hearing.	6.00	\$110.00	\$660.00
9/12/2019	LS	Billable Time notice from court re oral argument	0.25	\$110.00	\$27.50
9/13/2019	MG	Billable Time Traveled to and attended motion hearing for protective order; reviewed and began analysis of Summary Judgment motion submitted by Plaintiff.	5.50	\$110.00	\$605.00
9/13/2019	LS	Billable Time receipt and review of motion for summary judgment by plaintiff	0.75	\$110.00	\$82.50
9/15/2019	MG	Billable Time Work on preparing substantive memo for opposition to summary judgment focus.	1.50	\$110.00	\$165.00
9/16/2019	LS	Billable Time receipt and review of order re motion for protective order	0.25	\$110.00	\$27.50
9/17/2019	MG	Billable Time Research into appealing the denial of the protective order; steps that would be necessary, legal theories.	2.50	\$110.00	\$275.00
9/18/2019	MG	Billable Time Work on comprehensive memo outlining arguments to oppose summary judgment motion.	3.50	\$110.00	\$385.00
9/18/2019	LS	Billable Time receipt of notice of appearance by counsel for defendant	0.25	\$110.00	\$27.50
9/19/2019	MG	Billable Time Work on comprehensive memo outlining arguments to oppose summary judgment motion.	4.00	\$110.00	\$440.00
9/20/2019	MG	Billable Time Finalized comprehensive memo in issues for summary judgment motion.	3.00	\$110.00	\$330.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Oct 4, 2019

Invoice Num: 2019-2295

Billing Through: Sep 30, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02;) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/23/2019	MG	Billable Time Additions and revision to comprehensive memo on opposition to summary judgment.	2.50	\$110.00	\$275.00
9/24/2019	MG	Billable Time Analyzed material facts alleged by Plaintiff; determined legal sufficiency of the factual determinations began work on argument to oppose these facts.	8.50	\$110.00	\$935.00
9/25/2019	MG	Billable Time Work on opposition to summary judgment motion.	8.00	\$110.00	\$880.00
9/26/2019	MG	Billable Time Continued work on opposition to summary judgment motion.	5.00	\$110.00	\$550.00
9/27/2019	MG	Billable Time Finished draft of opposition to summary judgment brief.	4.00	\$110.00	\$440.00
9/29/2019	MG	Billable Time Reviewed site plans for application submitted to Planning Board; drafted memo regarding same.	2.25	\$110.00	\$247.50
9/30/2019	MG	Billable Time Additional work and revisions to opposition to summary judgment brief.	1.50	\$110.00	\$165.00
9/30/2019	LS	Billable Time research re standard for motion for leave to appeal interlocutory ruling allowing discovery	3.50	\$110.00	\$385.00

Total Service Amount: **\$7,067.50**

Amount Due This Invoice: **\$7,067.50**

Account Summary

<u>Ret. Received</u>	<u>Ret. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-2208	8/9/2019	\$1,032.50	\$1,032.50	\$0.00

Total Amount Due Including This Invoice: **\$7,067.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Oct 4, 2019

Invoice Num: 2019-2277

Billing Through: Sep 30, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/2/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		receipt and review of order re motion to dismiss			
9/3/2019	MG	Billable Time	0.75	\$110.00	\$82.50
		Work with Borough Administrator on changes to draft RFQ for real estate agent for 125 River Drive Property.			
9/4/2019	MG	Billable Time	0.75	\$110.00	\$82.50
		Conducted legal research for Borough Administrator regarding requirements for posting RFQ.			
9/9/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		receipt and review of filed judgment of possession			
9/9/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		letter to counsel for defendant re judgment of possession			
9/9/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email with client re judgment of possession			
9/9/2019	MG	Billable Time	0.25	\$110.00	\$27.50
		Emails regarding judgment of possession.			
9/10/2019	LS	Billable Time	3.50	\$110.00	\$385.00
		prepare answer to counterclaim			
9/11/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		letter to counsel for defendant re judgment of possession			
9/11/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from Tandy re deposition of Cassidy			
9/12/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email with Olmo re Cassidy deposition			
9/12/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from counsel for defendant re deposition in Baginski tenure matter			
9/18/2019	LS	Billable Time	3.25	\$110.00	\$357.50
		prepare answer to counterclaim			
9/18/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email to client re answer to counterclaim			
9/20/2019	LS	Billable Time	1.00	\$110.00	\$110.00
		email to client re deposition of Cassidy in Baginski tenure hearing			

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A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Oct 4, 2019

Invoice Num: 2019-2277

Billing Through: Sep 30, 2019

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Total Service Amount: **\$1,320.00**

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
9/11/2019	Lexis Nexis	Lexis Nexis	\$48.00
		Legal Research	
9/19/2019	LS	filing fee	\$175.00
		filing fee to file Answer to Counterclaim.	

Total Expenses: **\$223.00**

Amount Due This Invoice: **\$1,543.00**

Account Summary

Ref. Received	Ref. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2237	9/6/2019	\$7,910.50	\$2,562.50	\$7,910.50

Total Amount Due Including This Invoice: **\$9,453.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Oct 4, 2019

Invoice Num: 2019-2265

Billing Through: Sep 30, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/1/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email with Corrigan re Cassidy deposition			
9/2/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		letter from Corrigan re settlement proposals in civil rights case			
9/2/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		letter from Corrigan re issues with state pension board			
9/2/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		letter from Corrigan re status conference result			
9/2/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		review of additional discovery responses provide by Corrigan on behalf of Borough			
9/2/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		letter from Corrigan to Baginski re deposition			
9/3/2019	MG	Billable Time	0.25	\$110.00	\$27.50
		Email with labor counsel regarding status of termination hearings.			
9/3/2019	LS	Billable Time	2.00	\$110.00	\$220.00
		review of file in preparation for deposition of Baginski			
9/4/2019	LS	Billable Time	8.00	\$110.00	\$880.00
		attend deposition of Baginski in Woodcliff Lake, NJ - travel to/from same			
9/7/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		email with client re summary of Baginski deposition			
9/10/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email with Corrigan re Cassidy deposition			
9/11/2019	MG	Billable Time	0.25	\$110.00	\$27.50
		Emails related to issues involving claims raised by Baginski in depositions.			
9/11/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from Corrigan re transcripts and strategy			
9/11/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from Corrigan re deposition of Cassidy			
9/11/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from Corrigan re depositions of council members			

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Oct 4, 2019

Invoice Num: 2019-2265

Billing Through: Sep 30, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/11/2019	LS	Billable Time email with Corrigan re basis for protective order re council member depositions	0.25	\$110.00	\$27.50
9/12/2019	LS	Billable Time email from Selagy re deposition schedule	0.25	\$110.00	\$27.50
9/13/2019	LS	Billable Time email from Corrigan re deposition schedule	0.25	\$110.00	\$27.50
9/16/2019	LS	Billable Time email from Corrigan to Debal re depositions	0.25	\$110.00	\$27.50
9/16/2019	RM	Billable Time Tenure hearings: e-mails and telecoms with labor council regarding council member depositions and effect of resignation of Bryan Olkowski in this process.	1.50	\$110.00	\$165.00
9/17/2019	MG	Billable Time Email with labor counsel regarding depositions of council members; telephone conference with those members.	0.50	\$110.00	\$55.00
9/17/2019	LS	Billable Time email with counsel re status report to federal court	0.25	\$110.00	\$27.50
9/18/2019	MG	Billable Time Emails with labor counsel regarding depositions; conversations with council members to follow up confirming dates.	0.50	\$110.00	\$55.00
9/18/2019	LS	Billable Time review of file in preparation for deposition of Cassidy	1.50	\$110.00	\$165.00
9/19/2019	MG	Billable Time Email with labor counsel regarding rescheduling of depositions.	0.50	\$110.00	\$55.00
9/19/2019	LS	Billable Time attend deposition of Kurt Cassidy in North Haledon, NJ-travel to/from same	6.50	\$110.00	\$715.00
9/20/2019	MG	Billable Time Email with labor counsel arranging prep times.	0.50	\$110.00	\$55.00
9/20/2019	LS	Billable Time receipt of status report filed with court	0.50	\$110.00	\$55.00
9/20/2019	LS	Billable Time email with Corrigan re release of Baginski transcript	0.50	\$110.00	\$55.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Oct 4, 2019

Invoice Num: 2019-2265

Billing Through: Sep 30, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/23/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		order from court re settlement conference			
9/23/2019	MG	Billable Time	2.00	\$110.00	\$220.00
		Meeting with Councilman Androwis and labor counsel regarding deposition preparation.			
9/24/2019	MG	Billable Time	0.25	\$110.00	\$27.50
		Emails concerning deposition preparation of witness.			
9/25/2019	MG	Billable Time	1.50	\$110.00	\$165.00
		Meeting with Councilman Rachelski and labor counsel regarding deposition preparation.			
9/26/2019	MG	Billable Time	0.50	\$110.00	\$55.00
		Meeting with labor counsel and Councilman Androwis regarding debrief from deposition.			
9/30/2019	MG	Billable Time	0.50	\$110.00	\$55.00
		Conference with labor counsel and Councilman Rahcelski.			

Total Service Amount: \$3,685.00

Amount Due This Invoice: \$3,685.00

Account Summary

<u>Ret. Received</u>	<u>Ret. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-2223	9/6/2019	\$605.00	\$165.00	\$605.00

Total Amount Due Including This Invoice: \$4,290.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102
Moonachie, NJ 07074
Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Dec 6, 2019
Invoice Num: 2019-2354
Billing Through: Nov 30, 2019

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/6/2019	LS	Billable Time email from defense counsel to plaintiff's attorney re depositions	0.25	\$110.00	\$27.50
11/12/2019	MG	Billable Time Reviewed information provided by labor counsel regarding court rulings and depositions.	1.50	\$110.00	\$165.00
11/13/2019	LS	Billable Time email from Corrigan re subpoena	0.25	\$110.00	\$27.50
11/14/2019	MG	Billable Time Emails with labor counsel regarding deposition.	0.50	\$110.00	\$55.00
11/15/2019	LS	Billable Time telephone call to Corrigan re subpoena	0.25	\$110.00	\$27.50
11/18/2019	LS	Billable Time emails from Corrigan re submissions to ALJ	0.50	\$110.00	\$55.00
11/18/2019	MG	Billable Time Reviewed documents provided by labor counsel regarding updated on Baginski matter.	1.00	\$110.00	\$110.00
11/21/2019	MG	Billable Time Reviewed documentation provided by labor counsel regarding additional discovery.	1.00	\$110.00	\$110.00
11/21/2019	LS	Billable Time letter from Corrigan to ALJ re extension of time for brief	0.25	\$110.00	\$27.50
11/21/2019	LS	Billable Time meeting with Corrigan re application of quash subpoena	3.50	\$110.00	\$385.00
11/21/2019	LS	Billable Time review of file materials provided by Corrigan re application to quash subpoena	2.50	\$110.00	\$275.00
11/21/2019	LS	Billable Time legal research re motion to quash subpoena and local rules and procedures related to discovery disputes	2.00	\$110.00	\$220.00
11/22/2019	MG	Billable Time Reviewed letter from co-counsel regarding OEL matter.	0.50	\$110.00	\$55.00
11/22/2019	LS	Billable Time letter to Tandy re objection to Corrigan subpoena	0.50	\$110.00	\$55.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Dec 6, 2019

Invoice Num: 2019-2354

Billing Through: Nov 30, 2019

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/22/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email to client re objection to Corrigan deposition			
11/22/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from Corrigan re counsel member depositions			
11/25/2019	LS	Billable Time	1.00	\$110.00	\$110.00
		review of motion for summary judgment filed in tenure matter			
11/26/2019	MG	Billable Time	0.75	\$110.00	\$82.50
		Reviewed documents sent by labor counsel.			
11/26/2019	RM	Billable Time	1.00	\$110.00	\$110.00
		Review submission of labor counsel in the tenure hearings and respond to same.			
11/26/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from Corrigan re brief filed with ALJ			
11/26/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		letter from Corrigan to ALJ re case status			
11/26/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from Tandy re deposition dates			
11/27/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email with counsel re deposition dates			

Total Service Amount: \$2,062.50

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
11/21/2019	Lexis Nexis	Lexis Nexis	\$84.00
		Legal Research	

Total Expenses: \$84.00

Amount Due This Invoice: \$2,146.50

Account Summary

<u>Ref. Received</u>	<u>Ref. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev UnPaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-2310	11/8/2019	\$1,182.50	\$165.00	\$5,472.50

Total Amount Due Including This Invoice: \$7,619.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Dec 6, 2019

Invoice Num: 2019-2365

Billing Through: Nov 30, 2019

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

Date	Employee	Description	Hours	Rate	Amount
11/11/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		prepare warrant of removal			
11/11/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to court re warrant of removal			
11/13/2019	LS	Billable Time	0.75	\$110.00	\$82.50
		receipt and review of discovery demands from KC's Landscaping			
11/18/2019	MG	Billable Time	2.00	\$110.00	\$220.00
		Research related to Torts Claim Act and dismissal of complaints due to non-compliance.			
11/19/2019	MG	Billable Time	1.50	\$110.00	\$165.00
		Began working on drafting for Motion to Dismiss for failure to follow TCA.			
11/27/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		telephone call with court re warrant of removal			
11/27/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email with client re status of warrant of removal			
Total Service Amount:					\$660.00

Reimbursable Expenses:

Date	Employee	Description	Amount
11/15/2019	Treas St of NJ	filing fee	\$39.00
		Filing fee for Warrant of Removal check #1446	
11/26/2019	Lexis Nexis	Lexis Nexis	\$108.00
		Legal Research	
11/27/2019	Lexis Nexis	Lexis Nexis	\$250.00
		Legal Research.	
Total Expenses:			\$397.00
Amount Due This Invoice:			\$1,057.00

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2322	11/8/2019	\$1,265.00	\$2,562.50	\$10,718.50

Total Amount Due Including This Invoice: \$11,775.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Dec 6, 2019

Invoice Num: 2019-2380

Billing Through: Nov 30, 2019

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -

Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/6/2019	MG	Billable Time Meeting with Borough Administrator and intervenor counsel regarding reviewing Planning Board documents related to ordinance.	2.00	\$110.00	\$220.00
11/7/2019	MG	Billable Time Email to Borough Administrator regarding obtaining files from Dorothy Siek; phone call with intervenor counsel regarding missing information; work on appeal and obtaining documents.	2.25	\$110.00	\$247.50
11/8/2019	MG	Billable Time Drafted letter to Dorothy Siek regarding obtaining files, e-mails/telephone with Borough Administrator regarding obtaining files.	1.50	\$110.00	\$165.00
11/12/2019	MG	Billable Time Obtained and reviewed new Planning Board documents recovered from residency of Dorothy Siek; email to intervenor counsel regarding letter to Planning Board transmitting ordinance.	4.00	\$110.00	\$440.00
11/14/2019	LS	Billable Time receipt and review of WREIT motion for reconsideration	2.50	\$110.00	\$275.00
11/14/2019	MG	Billable Time Obtained and reviewed additional files from borough hall from Dorothy Siek.	2.00	\$110.00	\$220.00
11/15/2019	LS	Billable Time legal research re motions for reconsideration and interlocutory orders	2.50	\$110.00	\$275.00
11/15/2019	LS	Billable Time legal research re standards for extension of time to file prerogative writ complaint	1.50	\$110.00	\$165.00
11/15/2019	LS	Billable Time prepare motion for reconsideration, brief and certification with exhibits in support, and form of order	5.50	\$110.00	\$605.00
11/15/2019	LS	Billable Time review of order re summary judgment and analyze strategy between motion for leave to appeal and motion for reconsideration	2.00	\$110.00	\$220.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Dec 6, 2019

Invoice Num: 2019-2380

Billing Through: Nov 30, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -

Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/17/2019	MG	Billable Time Finished review of all documents provided Dorothy Siek seeking to ascertain any applicable to litigation.	3.50	\$110.00	\$385.00
11/21/2019	MG	Billable Time Delivered courtesy copy of motion to Judge Farrington.	1.00	\$110.00	\$110.00
11/21/2019	LS	Billable Time letter to court re courtesy copy of motion for reconsideration	0.50	\$110.00	\$55.00
11/22/2019	MG	Billable Time Email with opposing counsel regarding adjournment request.	0.50	\$110.00	\$55.00
11/26/2019	LS	Billable Time adjournment request from counsel for plaintiff re appellate brief	0.25	\$110.00	\$27.50
Total Service Amount:					\$3,465.00

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
11/15/2019	LS	Motion NOTICE OF CROSS-MOTION FOR RECONSIDERATION	\$50.00
11/15/2019	Lexis Nexis	Lexis Nexis Legal Research	\$228.00
Total Expenses:			\$278.00
Amount Due This Invoice:			\$3,743.00

Account Summary

Ref. Received	Ref. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2338	11/8/2019	\$10,890.00	\$1,032.50	\$17,957.50

Total Amount Due Including This Invoice: **\$21,700.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Dec 6, 2019

Invoice Num: 2019-2382

Billing Through: Nov 30, 2019

Victor Polce v Wallington 1088.07 (Victor Polce v Wallington 1088.07:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/5/2019	LS	Billable Time	3.50	\$110.00	\$385.00
		prepare motion for sanctions			
11/5/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		telephone call with counsel for plaintiff re motion for sanctions			
11/5/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email with client re motion for sanctions			
11/5/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from counsel for plaintiff accepting settlement			
11/5/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email to client re acceptance of settlement			
11/12/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to court re carry motion for fees			
11/12/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email to client re motion for fees			
11/27/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		prepare settlement agreement and release			
11/27/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email with counsel and review of proposed changes to settlement agreement			
11/27/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		telephone call with JIF defense counsel re settlement agreement and release			
11/27/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email to client re proposed settlement agreement			

Total Service Amount: \$852.50

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
11/5/2019	LS	Motion	\$50.00
		Court filing fee to file motion for sanctions.	

Total Expenses: \$50.00

Amount Due This Invoice: \$902.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Dec 6, 2019

Invoice Num: 2019-2382

Billing Through: Nov 30, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Victor Polce v Wallington 1088.07 (Victor Polce v Wallington 1088.07:) - Managed by (RM)

Account Summary

Ref. Received	Ref. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2340	11/8/2019	\$165.00	\$27.50	\$165.00

Total Amount Due Including This Invoice: **\$1,067.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Sep 6, 2019

Invoice Num: 2019-2223

Billing Through: Aug 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/1/2019	LS	Billable Time email with Dave Corrigan re depositions of Cassidy and Baginski	0.25	\$110.00	\$27.50
8/5/2019	LS	Billable Time email from Selagy re dates for Baginski deposition	0.25	\$110.00	\$27.50
8/16/2019	LS	Billable Time letter from Corrigan to Chakonis re expert testimony at tenure hearing	0.25	\$110.00	\$27.50
8/19/2019	LS	Billable Time letter from Corrigan to Tandy re discovery schedule	0.25	\$110.00	\$27.50
8/19/2019	LS	Billable Time telephone call with Corrigan re BCPO interviews of Cassidy and Baginski	0.25	\$110.00	\$27.50
8/19/2019	LS	Billable Time letter from Corrigan to Tandy re interviews	0.25	\$110.00	\$27.50
8/21/2019	LS	Billable Time letter from Corrigan to Tandy re supplemental discovery on tenure charges	0.50	\$110.00	\$55.00
8/23/2019	MG	Billable Time Emails with labor counsel regarding steps for termination.	0.25	\$110.00	\$27.50
8/23/2019	LS	Billable Time email with Corrigan re status of Federal Civil Rights action for status report to ALJ	0.50	\$110.00	\$55.00
8/23/2019	LS	Billable Time letter from Corrigan to Tandy re OPRA documents and documents related thereto	1.00	\$110.00	\$110.00
8/26/2019	LS	Billable Time letter from Corrigan to ALJ re status	0.50	\$110.00	\$55.00
8/26/2019	LS	Billable Time letter from Corrigan to State Pension department re subpoena	0.25	\$110.00	\$27.50
8/28/2019	LS	Billable Time letter for Corrigan to ALJ re status and Baginski request for adjournment	0.25	\$110.00	\$27.50
8/28/2019	LS	Billable Time letter for Baginski to ALJ re status report	0.25	\$110.00	\$27.50

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Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Sep 6, 2019

Invoice Num: 2019-2223

Billing Through: Aug 31, 2019

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/28/2019	LS	Billable Time letter from Corrigan re Baginski request to depose Borough officials	0.25	\$110.00	\$27.50
8/28/2019	LS	Billable Time letter from Corrigan re status of federal civil rights action for ALJ	0.25	\$110.00	\$27.50

Total Service Amount: \$605.00

Amount Due This Invoice: \$605.00

Account Summary

<u>Ret. Received</u>	<u>Ret. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-2127	7/10/2019	\$165.00	\$165.00	\$0.00

Total Amount Due Including This Invoice: \$605.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Sep 6, 2019

Invoice Num: 2019-2237

Billing Through: Aug 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/1/2019	MG	Billable Time Finished interrogatories on damages claim; assisted Leonard Seaman with Motion to Dismiss counterclaim.	4.00	\$110.00	\$440.00
8/1/2019	LS	Billable Time receipt of trial notice in tenancy matter	0.25	\$110.00	\$27.50
8/1/2019	LS	Billable Time review and analysis of counterclaim re points for motion to dismiss	2.00	\$110.00	\$220.00
8/1/2019	LS	Billable Time prepare notice of motion to dismiss counterclaim	0.25	\$110.00	\$27.50
8/1/2019	LS	Billable Time prepare form or order re motion to dismiss counterclaim	0.50	\$110.00	\$55.00
8/1/2019	LS	Billable Time prepare certification re motion to dismiss counterclaim	0.50	\$110.00	\$55.00
8/2/2019	MG	Billable Time Revisions and additions to discovery requests; work related to eviction complaint and following up with court.	2.50	\$110.00	\$275.00
8/2/2019	LS	Billable Time email to client re trial date	0.25	\$110.00	\$27.50
8/2/2019	LS	Billable Time legal research re LLBL restrictions on lease changes for motion to dismiss counterclaim	2.00	\$110.00	\$220.00
8/2/2019	LS	Billable Time legal research re LPCL restrictions on contracts for motion to dismiss	2.00	\$110.00	\$220.00
8/2/2019	LS	Billable Time legal research re malicious use of civil process standards for motion to dismiss counterclaim	1.50	\$110.00	\$165.00
8/2/2019	LS	Billable Time prepare brief in support of motion to dismiss counterclaim	5.50	\$110.00	\$605.00
8/2/2019	LS	Billable Time email to client re motion to dismiss counterclaim	0.50	\$110.00	\$55.00
8/2/2019	LS	Billable Time email to David Corrigan re motion to dismiss counterclaim	0.25	\$110.00	\$27.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Sep 6, 2019

Invoice Num: 2019-2237

Billing Through: Aug 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/6/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email with Mayor Tomko re landlord tenant trial			
8/6/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email with Celina Urbankowski re trial			
8/6/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email with client re trial			
8/7/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from Celina Urbankowski re trial and prep			
8/8/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email with Mark Tomko re trial			
8/9/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email with Hector Olmo re property inspection			
8/12/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		meeting with Celina Urbankowski re trial			
8/12/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		meeting with Hector Olmo re trial			
8/13/2019	LS	Billable Time	5.50	\$110.00	\$605.00
		review of file in preparation for landlord tenant trial, prepare exhibits, legal research re standards for possession and potential waiver issues			
8/14/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from Mayor Tomko re appearance at landlord tenant trial			
8/14/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email to client re Mayor Tomko appearance at trial			
8/14/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		letter from Corrigan to DeMarco re deposition of Cassidy in Baginski tenure matter			
8/14/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		receipt and review of motion to transfer tenancy action to law division and analysis of law relative to same			
8/14/2019	LS	Billable Time	4.50	\$110.00	\$495.00
		file review in preparation for landlord tenant trial, prepare exhibits, review and analysis of case law and statutes re eviction of hold over tenant and LLBL requirements for lease extension/amendment			

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Moonachie, NJ 07074

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Invoice

Invoice Date: Sep 6, 2019

Invoice Num: 2019-2237

Billing Through: Aug 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/14/2019	MG	Billable Time Assisted Leonard Seaman with trial preparation for hearing.	1.50	\$110.00	\$165.00
8/15/2019	LS	Billable Time attend court for tenancy action to dispose defendant, negotiate settlement, and place on record	7.50	\$110.00	\$825.00
8/16/2019	LS	Billable Time letter from counsel for KC's to court re form of order re disposition of order to show casue	0.25	\$110.00	\$27.50
8/19/2019	LS	Billable Time letter from Corrigan to DeMarco re deposition of Cassidy	0.25	\$110.00	\$27.50
8/19/2019	LS	Billable Time prepare form or order re judgment of possession	1.00	\$110.00	\$110.00
8/20/2019	LS	Billable Time prepare resolution re settlement of KC's tenancy action	1.00	\$110.00	\$110.00
8/22/2019	LS	Billable Time receipt and review of opposition to motion to dismiss counterclaim	1.50	\$110.00	\$165.00
8/23/2019	LS	Billable Time prepare letter reply brief in support of motion to dismiss counterclaim	2.50	\$110.00	\$275.00
8/25/2019	LS	Billable Time legal research re landlord reprisal statute for reply in support of motion to dismiss counterclaim	2.50	\$110.00	\$275.00
8/25/2019	LS	Billable Time finalize and file reply brief	1.00	\$110.00	\$110.00
8/26/2019	LS	Billable Time email to client re opposition to motion to dismiss and reply	0.50	\$110.00	\$55.00
8/26/2019	LS	Billable Time letter from Corrigan to DeMarco re depositions	0.25	\$110.00	\$27.50
8/26/2019	MG	Billable Time Reviewed legal requirements for RFP for realtor for 125 River property; drafted a draft RFP for Borough Administrator to review.	4.00	\$110.00	\$440.00

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A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Sep 6, 2019

Invoice Num: 2019-2237

Billing Through: Aug 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/28/2019	LS	Billable Time	0.00	\$110.00	\$0.00
		Notice from court re oral argument on motion to dismiss			
8/28/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		telephone call with court re oral argument			
8/28/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to court re oral argument			
8/28/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email with client re oral argument on motion to dismiss			
8/29/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		review of motion papers, opposition, and reply in			
		preparation for oral argument on motion to dismiss			
8/29/2019	LS	Billable Time	1.00	\$110.00	\$110.00
		review case law re landlord retaliation in preparation			
		for oral argument on motion to dismiss			
8/30/2019	LS	Billable Time	0.75	\$110.00	\$82.50
		oral argument on motion to dismiss			
8/30/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email with client re outcome of motion to dismiss			
Total Service Amount:					\$7,232.50

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
8/1/2019	LS	Filing Fee - Complaint	\$73.00
		filing fee for complaint.	
8/2/2019	Lexis Nexis	Lexis Nexis	\$120.00
		Legal Research	
8/2/2019	LS	filing fee	\$50.00
		Filing fee to file: Notice of Motion to dismiss counterclaim.	
8/14/2019	Lexis Nexis	Lexis Nexis	\$48.00
		Legal Research	
8/19/2019	Lexis Nexis	Lexis Nexis	\$105.00
		Legal Research	
8/25/2019	Lexis Nexis	Lexis Nexis	\$150.00
		Legal Research	
8/26/2019	Lexis Nexis	Lexis Nexis	\$132.00
		Legal Research	
Total Expenses:			\$678.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Sep 6, 2019

Invoice Num: 2019-2237

Billing Through: Aug 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM,

Amount Due This Invoice: **\$7,910.50**

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2194	8/9/2019	\$2,562.50	\$2,562.50	\$0.00

Total Amount Due Including This Invoice: **\$7,910.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Aug 9, 2019

Invoice Num: 2019-2187

Billing Through: Jul 31, 2019

Fehl v. Wallington (Fehl v. Wallington 1088.15;) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/8/2019	LS	Billable Time receipt and review of brief by insurance defense counsel in opposition to motion to compel discovery	0.50	\$110.00	\$55.00
7/8/2019	LS	Billable Time receipt and review of proposed discovery order	0.25	\$110.00	\$27.50

Total Service Amount: **\$82.50**

Amount Due This Invoice: **\$82.50**

Account Summary

<u>Ret. Received</u>	<u>Ret. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-2135	7/10/2019	\$220.00	\$220.00	\$0.00

Total Amount Due Including This Invoice: **\$82.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Aug 9, 2019

Invoice Num: 2019-2208

Billing Through: Jul 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02;) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/3/2019	MG	Billable Time Reviewed Answer submitted to Counterclaim; analyzed whether further action was necessary.	0.50	\$110.00	\$55.00
7/7/2019	MG	Billable Time Review of whether responsive records exist for Plaintiff's July 3 letter; letter responding to plaintiff counsel with findings.	1.25	\$110.00	\$137.50
7/8/2019	LS	Billable Time letter from counsel for plaintiff to court re return date of motion for protective order	0.25	\$110.00	\$27.50
7/8/2019	LS	Billable Time receipt and review of answer to counterclaim by plaintiff	0.50	\$110.00	\$55.00
7/10/2019	MG	Billable Time Reviewed letter provided by Deputy Clerk; advised Deputy Clerk on issues with documents.	0.50	\$110.00	\$55.00
7/11/2019	LS	Billable Time notice from court re motion for protective order	0.25	\$110.00	\$27.50
7/18/2019	LS	Billable Time receipt and review of opposition to motion for protective order	0.75	\$110.00	\$82.50
7/22/2019	LS	Billable Time legal research for reply brief in support of motion for protective order	1.50	\$110.00	\$165.00
7/22/2019	LS	Billable Time prepare letter reply brief re motion for protective order	2.00	\$110.00	\$220.00
7/22/2019	LS	Billable Time email to Hector Olmo re reply brief and opposition to motion	0.25	\$110.00	\$27.50
7/25/2019	MG	Billable Time Telephone conference with Judge Farrington's chambers regarding motion hearing.	0.25	\$110.00	\$27.50
7/25/2019	LS	Billable Time email with counsel for defendant re motion for protective order	0.25	\$110.00	\$27.50

Total Service Amount: \$907.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Aug 9, 2019

Invoice Num: 2019-2208

Billing Through: Jul 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -
Managed by (RM)

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
7/17/2019	Lexis Nexis	Lexis Nexis Legal Research	\$125.00

Total Expenses: \$125.00

Amount Due This Invoice: \$1,032.50

Account Summary

<u>Ret. Received</u>	<u>Ret. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-2161	7/10/2019	\$2,314.50	\$2,314.50	\$0.00

Total Amount Due Including This Invoice: \$1,032.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Aug 9, 2019

Invoice Num: 2019-2194

Billing Through: Jul 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/8/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		notice from court re adjournment of motion			
7/11/2019	MG	Billable Time	2.50	\$110.00	\$275.00
		Assisted Leonard Seaman with completing amended complaint in matter.			
7/11/2019	LS	Billable Time	2.00	\$110.00	\$220.00
		prepare and file new landlord-tenant complaint for eviction of defendant			
7/11/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email with client re landlord-tenant complaint			
7/11/2019	LS	Billable Time	1.00	\$110.00	\$110.00
		receipt and review of answer and counterclaim filed by defendant			
7/12/2019	MG	Billable Time	0.25	\$110.00	\$27.50
		Reviewed information provided by KC Landscaping counsel regarding water payment.			
7/12/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		receipt of order from court re motion to proceed summarily			
7/12/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email to client re motion result			
7/12/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		letter from counsel for defendant re water payment			
7/17/2019	MG	Billable Time	1.00	\$110.00	\$110.00
		Work on obtaining emails requested by insurance adjuster.			
7/17/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email with IT consultant re emails between Baginski and KC's Landscaping			
7/18/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		review of Borough emails related to KC Landscaping for employee dishonest claim			
7/24/2019	MG	Billable Time	1.75	\$110.00	\$192.50
		Began drafting interrogatories to KC Landscaping regarding damages complaint.			

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Aug 9, 2019

Invoice Num: 2019-2194

Billing Through: Jul 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/25/2019	MG	Billable Time Telephone conference with Landlord-Tenant court, resolved issues related to complaint.	2.00	\$110.00	\$220.00
7/31/2019	LS	Billable Time review and analysis of counterclaim re potential motion to dismiss	2.00	\$110.00	\$220.00
7/31/2019	LS	Billable Time legal research re motion to dismiss standards for motion to dismiss counterclaim	1.50	\$110.00	\$165.00
7/31/2019	LS	Billable Time prepare notice of motion to dismiss counterclaim	0.50	\$110.00	\$55.00
7/31/2019	LS	Billable Time prepare certification in support of motion to dismiss counterclaim	0.50	\$110.00	\$55.00
7/31/2019	LS	Billable Time prepare form of order re motion to dismiss counterclaim	0.50	\$110.00	\$55.00
7/31/2019	MG	Billable Time Work on drafting discovery requests.	2.50	\$110.00	\$275.00
Total Service Amount:					\$2,282.50

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
7/1/2019	Guaranteed Subpoena Service Inc.	Services Rendered Service to Kurt Cassidy on 5/2/19. Served letter. Invoice #20190429170155	\$65.00
7/1/2019	Guaranteed Subpoena Service Inc.	Services Rendered Service to Kurt Cassidy on 5/20/2019. Served Notice to Quit-Violation of Lease, Notice to Quit Holdover Tenancy. Invoice #20190514133230	\$65.00
7/31/2019	RM	Research Gann Service - Legal Research charge.	\$150.00

Total Expenses: **\$280.00**

Amount Due This Invoice: **\$2,562.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Aug 9, 2019

Invoice Num: 2019-2194

Billing Through: Jul 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM,

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2143	7/10/2019	\$2,353.00	\$2,353.00	\$0.00

Total Amount Due Including This Invoice: \$2,562.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Aug 9, 2019

Invoice Num: 2019-2210

Billing Through: Jul 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Victor Polce v Wallington 1088.07 (Victor Polce v Wallington 1088.07:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/8/2019	LS	Billable Time notice from court re dismissal of plaintiff's claims for lack of prosecution	0.25	\$110.00	\$27.50

Total Service Amount: \$27.50

Amount Due This Invoice: \$27.50

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2111	6/12/2019	\$1,320.00	\$1,320.00	\$0.00

Total Amount Due Including This Invoice: \$27.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Mar 8, 2019

Invoice Num: 2019-1967

Billing Through: Feb 28, 2019

Victor Polce v Wallington 1088.07 (Victor Polce v Wallington 1088.07:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
2/21/2019	MG	Billable Time Reviewed Complaint filed by Victor Polce against Borough; conference with R. Malagiere regarding Complaint.	1.00	\$110.00	\$110.00
2/22/2019	MG	Billable Time Email with borough clerk regarding service of Complaint.	0.25	\$110.00	\$27.50
2/25/2019	LS	Billable Time review and analysis of Borough crime policy and excess policy supplied by JIF	3.50	\$110.00	\$385.00
2/25/2019	LS	Billable Time receipt of complaint by Victor Polce and summons served on Borough	0.25	\$110.00	\$27.50
2/25/2019	LS	Billable Time letter to John Markel re Polce complaint	0.50	\$110.00	\$55.00
2/26/2019	LS	Billable Time Review letter from counsel for JIF re employee crime investigation	0.50	\$110.00	\$55.00
2/26/2019	LS	Billable Time letter to counsel for fund re handling of matter and production of records	0.50	\$110.00	\$55.00
2/27/2019	LS	Billable Time legal research re CEPA elements re employer conduct for frivolous claim letter to Polce and attorney	2.50	\$110.00	\$275.00

Total Service Amount: **\$990.00**

Amount Due This Invoice: **\$990.00**

Account Summary

Ref. Received	Ref. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	-	--	\$0.00	\$0.00	\$0.00

Total Amount Due Including This Invoice: **\$990.00**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Mar 8, 2019

Invoice Num: 2019-1964

Billing Through: Feb 28, 2019

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

Date	Employee	Description	Hours	Rate	Amount
2/20/2019	MG	Billable Time	0.25	\$110.00	\$27.50
		Email to Richard Cedzidlo regarding picking up file.			
2/22/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to Chris Botta re employee dishonesty claim			
2/22/2019	MG	Billable Time	2.50	\$110.00	\$275.00
		Received and reviewed file from previous counsel and conference with R. Malagiere regarding same.			
2/26/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email to Hector Olmo re crime investigation			
2/26/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		review of KC Landscaping lease for tenancy action			
2/26/2019	LS	Billable Time	2.00	\$110.00	\$220.00
		prepare complaint for eviction of KC Landscaping			
2/27/2019	LS	Billable Time	2.00	\$110.00	\$220.00
		receipt and review of file materials re KC Landscaping claim from Richard Cedzidlo			
2/27/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email to Hector Olmo re current version of lease with KC Landscaping			
2/28/2019	LS	Billable Time	2.50	\$110.00	\$275.00
		meeting with Hector Olmo re KC Landscaping documents and Police resolution			
2/28/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		revise notice to quit to KC's Landscaping, email to Hector Olmo for signature			

Total Service Amount: **\$1,347.50**

Amount Due This Invoice: **\$1,347.50**

Account Summary

Ref. Received	Ref. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	--	--	\$0.00	\$0.00	\$0.00

Total Amount Due Including This Invoice: **\$1,347.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: May 8, 2019

Invoice Num: 2019-2033

Billing Through: Apr 30, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Fehl v. Wallington (Fehl v. Wallington 1088.15;) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
4/8/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		prepare and file notice of appearance in Fehl v. Wallington			

Total Service Amount: \$55.00

Amount Due This Invoice: \$55.00

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	--	--	\$0.00	\$0.00	\$0.00

Total Amount Due Including This Invoice: \$55.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102
Moonachie, NJ 07074
Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: May 8, 2019
Invoice Num: 2019-2059
Billing Through: Apr 30, 2019

Victor Polce v Wallington 1088.07 (Victor Polce v Wallington 1088.07:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
4/4/2019	LS	Billable Time email to Hector Olmo re status of document review for carrier on employee dishonesty claim	0.25	\$110.00	\$27.50
4/9/2019	LS	Billable Time prepare notice of motion, brief, certification, statement of material facts, and order re motion for partial summary judgment	6.50	\$110.00	\$715.00
4/9/2019	LS	Billable Time email to client re summary judgment motion	0.50	\$110.00	\$55.00
4/9/2019	LS	Billable Time prepare and file notice of appearance	0.25	\$110.00	\$27.50
4/10/2019	LS	Billable Time email with David Pfund re motion for summary judgment	0.25	\$110.00	\$27.50
4/18/2019	LS	Billable Time review of plaintiff's cross motion to file amended complaint	0.50	\$110.00	\$55.00
4/24/2019	LS	Billable Time receipt and review of reply brief by Pfund	0.25	\$110.00	\$27.50
4/25/2019	LS	Billable Time file review in preparation for oral argument on motion to dismiss	1.00	\$110.00	\$110.00
4/26/2019	LS	Billable Time attend court for oral argument on motion to dismiss	2.50	\$110.00	\$275.00
4/26/2019	LS	Billable Time email to Hector Olmo re motion to dismiss	0.50	\$110.00	\$55.00
4/30/2019	LS	Billable Time receipt of Polce opposition to motion	1.00	\$110.00	\$110.00
Total Service Amount:					\$1,485.00

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
4/9/2019	Treas St of NJ	filing fee Fee for filing of Motion for Summary Judgment.	\$50.00
4/10/2019	Treas St of NJ	filing fee Fee for filing of Notice of Appearance.	\$50.00
Total Expenses:			\$100.00

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Moonachie, NJ 07074

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Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: May 8, 2019

Invoice Num: 2019-2059

Billing Through: Apr 30, 2019

Victor Polce v Wallington 1088.07 (Victor Polce v Wallington 1088.07:) - Managed by (RM)

Amount Due This Invoice: **\$1,585.00**

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2013	4/17/2019	\$2,724.65	\$990.00	\$2,724.65

Total Amount Due Including This Invoice: **\$4,309.65**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: May 8, 2019

Invoice Num: 2019-2042

Billing Through: Apr 30, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
4/1/2019	LS	Billable Time research re corporate status of Nurse Stock 2 go for complaint to evict	0.50	\$110.00	\$55.00
4/2/2019	LS	Billable Time conference with court staff re filing tenancy complaint based on location/postal address of property	0.50	\$110.00	\$55.00
4/3/2019	MG	Billable Time Began preparing work to shut off water once April 15th deadline passes.	1.25	\$110.00	\$137.50
4/4/2019	MG	Billable Time Compiled all proofs of service in anticipation of filing shut off; telephone call with PVSC.	1.00	\$110.00	\$110.00
4/4/2019	LS	Billable Time email to client re investigation re damages in tenancy action	0.50	\$110.00	\$55.00
4/5/2019	MG	Billable Time Telephone call with Borough Administrator regarding water shut offs; research memo regarding borough leasing property.	3.50	\$110.00	\$385.00
4/5/2019	LS	Billable Time email from Hector Olmo re borough employee re proof of water claims	0.25	\$110.00	\$27.50
4/5/2019	LS	Billable Time email to client re status of filing and trial date	0.25	\$110.00	\$27.50
4/8/2019	MG	Billable Time Finalized memo regarding lease of property; work regarding shutting off water (determining costs, cooperation with PVWC); drafted letter to shut off water for Borough Administrator to send out.	2.00	\$110.00	\$220.00
4/12/2019	LS	Billable Time meeting with borough employees re testimony for water usage in tenancy action	1.50	\$110.00	\$165.00
4/12/2019	LS	Billable Time receipt of report re inspection of property	0.50	\$110.00	\$55.00
4/15/2019	LS	Billable Time email from Hector Olmo re property photos	0.25	\$110.00	\$27.50

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Invoice

Invoice Date: May 8, 2019

Invoice Num: 2019-2042

Billing Through: Apr 30, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM,

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
4/17/2019	MG	Billable Time Emails related to the shutting off of water at the property.	0.25	\$110.00	\$27.50
4/18/2019	LS	Billable Time email with Hector Olmo re preparation for hearing	0.25	\$110.00	\$27.50
4/22/2019	LS	Billable Time attend court for order to show cause re water	2.00	\$110.00	\$220.00
4/22/2019	LS	Billable Time email to Hector Olmo re order to show cause	0.50	\$110.00	\$55.00
4/22/2019	LS	Billable Time attend court for order to show cause	2.00	\$110.00	\$220.00
4/22/2019	LS	Billable Time file review in preparation for landlord tenant hearing	4.50	\$110.00	\$495.00
4/23/2019	LS	Billable Time letter from counsel for plaintiff re water shut off.	0.25	\$110.00	\$27.50
4/23/2019	LS	Billable Time letter to counsel for plaintiff re water shut off	0.50	\$110.00	\$55.00
4/23/2019	LS	Billable Time attend court for landlord tenant trial	5.00	\$110.00	\$550.00
4/23/2019	LS	Billable Time email to Hector Olmo re Baginski interference with water shut off	0.25	\$110.00	\$27.50
4/23/2019	LS	Billable Time attend court re second order to show cause	3.50	\$110.00	\$385.00
4/23/2019	LS	Billable Time email to Hector Olmo re second order to show cause	0.50	\$110.00	\$55.00
4/23/2019	MG	Billable Time Conference with Leonard Seaman regarding result of eviction hearing; research related to law on uncollected water bills.	0.75	\$110.00	\$82.50
4/24/2019	LS	Billable Time receipt of trial notice	0.25	\$110.00	\$27.50
4/24/2019	LS	Billable Time letter from counsel for KC's re deposit for water	0.25	\$110.00	\$27.50
4/24/2019	LS	Billable Time receipt and review of order re water at property	0.25	\$110.00	\$27.50

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Moonachie, NJ 07074

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Invoice

Invoice Date: May 8, 2019

Invoice Num: 2019-2042

Billing Through: Apr 30, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM,

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
4/24/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to PVWC re water turn on			
4/24/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email to Hector Olmo re order to turn on water			
4/24/2019	LS	Billable Time	1.00	\$110.00	\$110.00
		prepare memo re lease termination and proposed action			
4/25/2019	MG	Billable Time	0.25	\$110.00	\$27.50
		Correspondence with opposing counsel regarding court order.			
4/25/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		prepare resolution re lease termination			
4/26/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		prepare draft letter to KC re lease termination			
4/26/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email to Hector Olmo re termination notice letter to KC's			
4/26/2019	LS	Billable Time	1.00	\$110.00	\$110.00
		receipt and review of motion to transfer from tenancy to law division			
4/26/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email to Hector Olmo re motion and plan for opposition			
4/26/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		letter from counsel for KC re water meter preservation			
4/26/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email to Hector Olmo re water meter preservation			
4/29/2019	MG	Billable Time	1.25	\$110.00	\$137.50
		Met with Borough Administrator regarding documents to be served on KC Landscaping.			
4/29/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		prepare and serve notice of termination on KC			
4/29/2019	MG	Billable Time	1.25	\$110.00	\$137.50
		Met with Borough Administrator regarding documents to be served on KC Landscaping.			
4/30/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		legal research re entire controversy doctrine as applied to tenancy actions			

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Moonachie, NJ 07074

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Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: May 8, 2019

Invoice Num: 2019-2042

Billing Through: Apr 30, 2019

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

Date	Employee	Description	Hours	Rate	Amount
4/30/2019	LS	Billable Time prepare amended complaint	2.50	\$110.00	\$275.00
Total Service Amount:					\$5,087.50

Reimbursable Expenses:

Date	Employee	Description	Amount
4/5/2019	LS	Doc. Fee Online document fee	\$6.45
4/8/2019	Treas St of NJ	filing fee Filing fee for filing of Tenancy Complaint.	\$73.00
4/29/2019	FED EX	Federal Express Fed Ex to Kurt Cassidy tracking #775088256482	\$29.65
4/29/2019	FED EX	Federal Express Fed Ex to Kurt Cassidy, KC Landscaping, Inc. Tracking #775088230828	\$29.65
4/29/2019	FED EX	Federal Express Fed Ex to Kurt Cassidy, Fort Lee, NJ tracking # 775088202298	\$29.65
4/30/2019	Lexis Nexis	Lexis Nexis Legal Research	\$60.00
Total Expenses:			\$228.40
Amount Due This Invoice:			\$5,315.90

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-1996	4/17/2019	\$4,173.45	\$1,347.50	\$4,173.45

Total Amount Due Including This Invoice: \$9,489.35

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: May 8, 2019
Invoice Num: 2019-2023
Billing Through: Apr 30, 2019

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
4/1/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		emails with counsel re submission of discovery order			
4/2/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		review of filed discovery plan			
4/4/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		review filed scheduling order			
4/5/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email with carrier counsel for borough re discovery			
4/12/2019	LS	Billable Time	1.00	\$110.00	\$110.00
		review of discovery materials in preparation for			
		conference call with Scott Sylagi re litigation status			
4/12/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		telephone call with Scott Sylagi re litigation status			
4/12/2019	MG	Billable Time	0.50	\$110.00	\$55.00
		Reviewed case information in preparation for meeting.			
4/15/2019	MG	Billable Time	0.25	\$110.00	\$27.50
		Emails related to the status of litigation.			
4/15/2019	LS	Billable Time	0.75	\$110.00	\$82.50
		email to RM re conference with Salyagi			
4/29/2019	MG	Billable Time	1.25	\$110.00	\$137.50
		Emails regarding interference with KC Landscaping			
		shut off; reviewed information provided.			
4/29/2019	MG	Billable Time	1.25	\$110.00	\$137.50
		E-mails regarding interference with KC Landscaping			
		shut off; reviewed information provided.			

Total Service Amount: \$852.50

Amount Due This Invoice: \$852.50

Account Summary

<u>Ret. Received</u>	<u>Ret. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-1978	4/17/2019	\$522.50	\$0.00	\$522.50

Total Amount Due Including This Invoice: \$1,375.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Apr 17, 2019

Invoice Num: 2019-2013

Billing Through: Mar 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Victor Polce v Wallington 1088.07 (Victor Polce v Wallington 1088.07:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/1/2019	MG	Billable Time E-mail to Borough Admin regarding minutes of Polce hiring meeting; reviewed conformance with ordinance; research regarding ability to take another vote on admin.	2.00	\$110.00	\$220.00
3/4/2019	MG	Billable Time Research regarding nunc pro tunc resolutions; drafted Resolution regarding confirming termination.	2.25	\$110.00	\$247.50
3/8/2019	LS	Billable Time prepare frivolous claim letters to Polce and attorney	2.50	\$110.00	\$275.00
3/8/2019	LS	Billable Time legal research re elements of CEPA re complaint about illegal conduct of co-worker	5.50	\$110.00	\$605.00
3/12/2019	LS	Billable Time email to John Markel re coverage for claim	0.25	\$110.00	\$27.50
3/12/2019	LS	Billable Time telephone call with John Markel re coverage	0.25	\$110.00	\$27.50
3/12/2019	LS	Billable Time email to David Pfund re representation in Polce claim	0.50	\$110.00	\$55.00
3/14/2019	LS	Billable Time legal research re elements of CEPA claim for frivolous claim letter to Polce and attorney	2.50	\$110.00	\$275.00
3/15/2019	LS	Billable Time prepare R 1:4-8 letter to counsel for Polce	1.50	\$110.00	\$165.00
3/15/2019	LS	Billable Time prepare frivolous law suit notice to Polce	1.00	\$110.00	\$110.00
3/15/2019	LS	Billable Time email to David Pfund re frivolous claim letters	0.50	\$110.00	\$55.00
3/18/2019	LS	Billable Time email from David Pfund re frivolous claim notice	0.25	\$110.00	\$27.50
3/22/2019	MG	Billable Time Research regarding borough indemnification ordinances.	1.00	\$110.00	\$110.00
3/26/2019	LS	Billable Time email to David Pfund re motion to dismiss	0.25	\$110.00	\$27.50
3/26/2019	LS	Billable Time email with David Pfund re motion to dismiss	0.25	\$110.00	\$27.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Apr 17, 2019

Invoice Num: 2019-2013

Billing Through: Mar 31, 2019

Victor Polce v Wallington 1088.07 (Victor Polce v Wallington 1088.07:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/27/2019	LS	Billable Time email with defense counsel re motion to dismiss	0.25	\$110.00	\$27.50
3/27/2019	MG	Billable Time Reviewed and analyzed indemnification ordinance provided by Borough Clerk.	1.00	\$110.00	\$110.00
3/29/2019	LS	Billable Time receipt, review, and analysis of reservation of rights letter from Summit Risk re claim	1.00	\$110.00	\$110.00
3/29/2019	LS	Billable Time email to Hector Olmo re reservation of rights and further action through claim to workers compensation carrier for bodily injury claims	0.50	\$110.00	\$55.00
3/29/2019	LS	Billable Time receipt and review motion to dismiss filed by carrier counsel	1.00	\$110.00	\$110.00
3/29/2019	MG	Billable Time E-mails regarding motion to dismiss.	0.25	\$110.00	\$27.50
Total Service Amount:					\$2,695.00

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
3/15/2019	FED EX	Federal Express Fed Ex to Christopher P. Lenzo, Esq. Tracking #774718877049	\$29.65
Total Expenses:			\$29.65
Amount Due This Invoice:			\$2,724.65

Account Summary

Ref. Received	Ref. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-1967	3/8/2019	\$990.00	\$990.00	\$0.00

Total Amount Due Including This Invoice: **\$2,724.65**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Apr 17, 2019

Invoice Num: 2019-1996

Billing Through: Mar 31, 2019

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/1/2019	LS	Billable Time receipt and review of Borough's version of lease and comparison of same to copy on hand	1.00	\$110.00	\$110.00
3/4/2019	LS	Billable Time email with Hector Olmo re meeting for documents for JIF/MEL claim	0.25	\$110.00	\$27.50
3/4/2019	LS	Billable Time receipt of completed letter from Borough re cancellation of holdover tenancy	0.25	\$110.00	\$27.50
3/4/2019	LS	Billable Time notice from process server re lack of service on tenant	0.25	\$110.00	\$27.50
3/4/2019	LS	Billable Time letter to KC's Landscaping re service	0.50	\$110.00	\$55.00
3/4/2019	MG	Billable Time Picked up information from Borough Administrator regarding outstanding charges; revised demand letter.	1.25	\$110.00	\$137.50
3/5/2019	LS	Billable Time meeting with Hector Olmo re documents for JIF/MEL claim, travel to/from Borough Hall for same	2.50	\$110.00	\$275.00
3/5/2019	LS	Billable Time prepare complaint for tenancy action to evict	2.00	\$110.00	\$220.00
3/6/2019	MG	Billable Time Revised demand letter; telephone call with Borough Administrator regarding status of PVSC request to terminate water.	0.50	\$110.00	\$55.00
3/7/2019	LS	Billable Time research re corporate status of KC Landscaping for complaint to evict	1.00	\$110.00	\$110.00
3/7/2019	LS	Billable Time prepare complaint for damages against KC's Landscaping and principal	2.50	\$110.00	\$275.00
3/7/2019	MG	Billable Time Emails and conference with R. Malagiere regarding finalizing demand; prepared demand letter for sending; personal service of letter.	1.50	\$110.00	\$165.00

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A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Apr 17, 2019

Invoice Num: 2019-1996

Billing Through: Mar 31, 2019

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/9/2019	LS	Billable Time fax from KC's Landscaping re service of notices	0.25	\$110.00	\$27.50
3/12/2019	LS	Billable Time telephone call with Hector Olmo re documents for JIF/MEL claim	0.25	\$110.00	\$27.50
3/12/2019	MG	Billable Time Reviewed correspondence from KC Landscaping regarding previous letters; work on new correspondence to KC.	0.50	\$110.00	\$55.00
3/14/2019	MG	Billable Time Work related to determining how to turn off water to property.	2.00	\$110.00	\$220.00
3/15/2019	MG	Billable Time Visiting Wallington and Passaic post offices to obtain addresses; work on letter to shut off water.	2.50	\$110.00	\$275.00
3/18/2019	MG	Billable Time Telephone conference with PVSC regarding turning off water; trip to Passaic post office follow up.	2.00	\$110.00	\$220.00
3/19/2019	MG	Billable Time Telephone conference with Borough Administrator regarding documents needed; reviewed entire file to determine which documents which were already provided.	1.00	\$110.00	\$110.00
3/20/2019	MG	Billable Time Filed action in Landlord Tenant court.	3.25	\$110.00	\$357.50
3/20/2019	LS	Billable Time prepare complaint for damages from KC's Landscaping and fraud claims against Kurt Cassidy	2.50	\$110.00	\$275.00
3/25/2019	LS	Billable Time letter from counsel for KC's Landscaping re extension to lease	0.50	\$110.00	\$55.00
3/25/2019	LS	Billable Time email to Hector Olmo re lease extension claim	0.50	\$110.00	\$55.00
3/25/2019	LS	Billable Time legal research re impact of Local Land and Buildings Law requirements for lease extension and case law re same	2.50	\$110.00	\$275.00

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Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Apr 17, 2019

Invoice Num: 2019-1996

Billing Through: Mar 31, 2019

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/25/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email to Hector Olmo re LLBL and lease extension			
3/25/2019	MG	Billable Time	1.00	\$110.00	\$110.00
		Follow up with PVSC on water shut off procedures;			
		follow up with post office on obtaining address			
		information.			
3/27/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		file review regarding proofs of water billing to			
		defendant for use at trial in eviction proceeding			
3/27/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email to Hector Olmo re proofs of damages			
Total Service Amount:					\$3,822.50

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
3/4/2019	FED EX	Federal Express	\$29.65
		Fed Ex to Kurt Cassidy Tracking#77461498450	
3/7/2019	FED EX	Federal Express	\$29.65
		Fed Ex to Kurt Cassidy, KC Landscaping Tracking # 774643203998	
3/7/2019	FED EX	Federal Express	\$29.65
		Fed Ex to Kurt Cassidy, KC Landscaping. Tracking # 774643248158	
3/17/2019	Lexis Nexis	Lexis Nexis	\$80.00
		Legal Research	
3/20/2019	Lexis Nexis	Lexis Nexis	\$96.00
		Legal Research	
3/29/2019	Lexis Nexis	Lexis Nexis	\$86.00
		Legal Research	

Total Expenses: **\$350.95**

Amount Due This Invoice: **\$4,173.45**

Account Summary

Ref. Received	Ref. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-1964	3/8/2019	\$1,347.50	\$1,347.50	\$0.00

Total Amount Due Including This Invoice: **\$4,173.45**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Jun 12, 2019
Invoice Num: 2019-2093
Billing Through: May 31, 2019

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/2/2019	LS	Billable Time prepare landlord verification for amended complaint, email to Hector Olmo re same	0.50	\$110.00	\$55.00
5/2/2019	MG	Billable Time E-mails regarding amending complaint/reconsideration.	0.25	\$110.00	\$27.50
5/3/2019	MG	Billable Time Research regarding determining council in 2011; research regarding proper amendments to lease agreement; memo on whether KC Landscaping amendment complied.	2.25	\$110.00	\$247.50
5/3/2019	LS	Billable Time receipt of notice of service on KC	0.25	\$110.00	\$27.50
5/3/2019	LS	Billable Time prepare notice of cross-motion	0.25	\$110.00	\$27.50
5/3/2019	LS	Billable Time prepare form of order	0.25	\$110.00	\$27.50
5/3/2019	LS	Billable Time prepare certification and exhibits in support of cross motion	0.50	\$110.00	\$55.00
5/3/2019	LS	Billable Time prepare letter brief in support of cross-motion	3.50	\$110.00	\$385.00
5/5/2019	LS	Billable Time email to Mayor Tomko re appearance at trial	0.50	\$110.00	\$55.00
5/5/2019	LS	Billable Time email to Urbankowski re trial appearance	0.50	\$110.00	\$55.00
5/6/2019	LS	Billable Time conference call with court	0.50	\$110.00	\$55.00
5/6/2019	LS	Billable Time email to client re conference with court	0.25	\$110.00	\$27.50
5/7/2019	LS	Billable Time receipt and review of reply brief from defendant	0.75	\$110.00	\$82.50
5/7/2019	LS	Billable Time email to Mayor Tomko re trial	0.25	\$110.00	\$27.50
5/7/2019	LS	Billable Time email to Urbankowski re trial	0.25	\$110.00	\$27.50

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Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Jun 12, 2019

Invoice Num: 2019-2093

Billing Through: May 31, 2019

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/7/2019	LS	Billable Time	2.50	\$110.00	\$275.00
		attend court for case management conference			
5/7/2019	LS	Billable Time	4.00	\$110.00	\$440.00
		file review in preparation for tenancy trial			
5/8/2019	MG	Billable Time	1.00	\$110.00	\$110.00
		Assisted L. Seaman in preparation of eviction hearing.			
5/8/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from Celina Urbankowicz re trial appearance			
5/8/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		letter from counsel for defendant to court re revised notice to quit			
5/8/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		telephone call with counsel for defendant re settlement, email to client re same			
5/8/2019	LS	Billable Time	4.50	\$110.00	\$495.00
		file review in preparation for trial, prepare trial exhibits			
5/8/2019	LS	Billable Time	3.00	\$110.00	\$330.00
		attend court for trial			
5/8/2019	LS	Billable Time	1.00	\$110.00	\$110.00
		email to client with analysis of trial result			
5/9/2019	LS	Billable Time	2.50	\$110.00	\$275.00
		legal research re court ruling on notices and applicability of same			
5/9/2019	LS	Billable Time	1.00	\$110.00	\$110.00
		email to client re appeal analysis			
5/9/2019	LS	Billable Time	1.00	\$110.00	\$110.00
		letter to Hector Olmo re water supply status			
5/9/2019	LS	Billable Time	0.75	\$110.00	\$82.50
		draft letter from Borough to PVWC re water supply			
5/10/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		revise proposed letter to PVWC re water supply			
5/13/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		prepare notice of additional rent due			
5/13/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		prepare notice to quit re holdover			

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Moonachie, NJ 07074

Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Jun 12, 2019

Invoice Num: 2019-2093

Billing Through: May 31, 2019

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/13/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		prepare notice to quit re use of property			
5/13/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email to client re notices to be served on tenant			
5/13/2019	LS	Billable Time	1.00	\$110.00	\$110.00
		legal research re required format for effective notice to quit			
5/14/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		transmit notices to process server for service			
5/14/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email to client re notices served on tenant			
5/15/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		telephone call with counsel for tenant re water shut off			
5/15/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		telephone call with client re water shut off			
5/15/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email with client re water shut off			
5/15/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to tenant's attorney re amount required to restore water			
5/15/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter from counsel for KC re water shut off			
5/15/2019	LS	Billable Time	1.00	\$110.00	\$110.00
		response to letter from KC re water shut off			
5/15/2019	LS	Billable Time	2.00	\$110.00	\$220.00
		prepare complaint for damages in Law Division			
5/15/2019	LS	Billable Time	1.00	\$110.00	\$110.00
		legal research re application to proceed summarily			
5/15/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		prepare motion to proceed in summary manner			
5/15/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email to client re complaint and motion to proceed summarily			
5/15/2019	MG	Billable Time	0.50	\$110.00	\$55.00
		Assisted L. Seaman with Complaint regarding collection of outstanding fees.			

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102
Moonachie, NJ 07074
Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Jun 12, 2019
Invoice Num: 2019-2093
Billing Through: May 31, 2019

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM,

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/16/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to court re courtesy copy of motion			
5/16/2019	RM	Billable Time	1.00	\$110.00	\$110.00
		Prepare memorandum of status of litigation for council communications regarding same.			
5/17/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		receipt and review of order to show cause by KC's			
5/17/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		letter to court in opposition to OTSC claim for temporary restraints			
5/17/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email to client re inspection of property re availability of water			
5/17/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		letter from counsel for defendant re hearing on OTSC			
5/17/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		letter to court re hearing date for OTSC			
5/17/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email from client re property inspection			
5/17/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email to client re OTSC by KC's			
5/17/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		email to client re letters to court on hearing date for OTSC			
5/17/2019	MG	Billable Time	0.25	\$110.00	\$27.50
		Reviewed new court documents filed by KC Landscaping.			
5/19/2019	LS	Billable Time	1.50	\$110.00	\$165.00
		legal research re Local Public Contracts Law and impact on supposed quid pro quo barter agreement with KC's			
5/20/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		receipt of order to show cause entered by court			
5/20/2019	LS	Billable Time	0.50	\$110.00	\$55.00
		email to client re entered order to show cause			
5/20/2019	LS	Billable Time	0.25	\$110.00	\$27.50
		receipt and review of affidavit of service			

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Moonachie, NJ 07074

Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Invoice Date: Jun 12, 2019

Invoice Num: 2019-2093

Billing Through: May 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/21/2019	LS	Billable Time telephone call with counsel for KC's re settlement	0.25	\$110.00	\$27.50
5/21/2019	LS	Billable Time letter to counsel for KC's re inspection of property	0.50	\$110.00	\$55.00
5/21/2019	LS	Billable Time legal research re equitable claims/defenses involving public entity for waiver, latches, and quantum meruit	2.00	\$110.00	\$220.00
5/21/2019	MG	Billable Time Reviewed latest order to assist in proceeding with case.	0.25	\$110.00	\$27.50
5/23/2019	LS	Billable Time letter from counsel for KC's re inspection and amount due to restore water	0.25	\$110.00	\$27.50
5/24/2019	RM	Billable Time Conference with LES, Esq. regarding council's decision to resume water service.	0.50	\$110.00	\$55.00
5/24/2019	LS	Billable Time email with client re council resolution re water payment	0.25	\$110.00	\$27.50
5/24/2019	LS	Billable Time letter to counsel for KC re amount due to restore water service	0.75	\$110.00	\$82.50
5/28/2019	LS	Billable Time telephone call with Hector Olmo re amount due from defendant since last bill	0.25	\$110.00	\$27.50
5/28/2019	LS	Billable Time letter to counsel for defendant re amount due to restore water	0.75	\$110.00	\$82.50
5/30/2019	LS	Billable Time email with client re payments by defendant	0.25	\$110.00	\$27.50
5/30/2019	LS	Billable Time telephone call with counsel for KC re payment	0.25	\$110.00	\$27.50
5/30/2019	LS	Billable Time letter to counsel for KC re payment	0.50	\$110.00	\$55.00
5/30/2019	LS	Billable Time letter to counsel for KC re payment	0.25	\$110.00	\$27.50
5/30/2019	LS	Billable Time letter from counsel for KC re payment	0.25	\$110.00	\$27.50

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Invoice

Invoice Date: Jun 12, 2019

Invoice Num: 2019-2093

Billing Through: May 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Professional Services

Date	Employee	Description	Hours	Rate	Amount
5/30/2019	LS	Billable Time legal research re failure to brief argument/waiver for opposition to order to show cause	1.50	\$110.00	\$165.00
5/30/2019	LS	Billable Time legal research re grounds for attorney fees for opposition to order to show cause	2.00	\$110.00	\$220.00
5/30/2019	LS	Billable Time legal research re Crowe v. DiGioia standard for injunctive relief for opposition to order to show cause	2.50	\$110.00	\$275.00
5/30/2019	LS	Billable Time prepare certification and exhibits for opposition to order to show cause	2.00	\$110.00	\$220.00
5/30/2019	LS	Billable Time prepare letter brief in opposition to order to show cause	3.50	\$110.00	\$385.00
5/30/2019	LS	Billable Time legal research re standards for shut off of water by municipality	1.50	\$110.00	\$165.00
Total Service Amount:					\$8,580.00

Reimbursable Expenses:

Date	Employee	Description	Amount
5/3/2019	FED EX	Federal Express Fed Ex to John P. De Marco, Esq. Tracking #: 775129933392	\$29.65
5/3/2019	Lexis Nexis	Lexis Nexis Legal Research	\$200.00
5/8/2019	Lexis Nexis	Lexis Nexis Legal Research	\$120.00
5/9/2019	Lexis Nexis	Lexis Nexis Legal Research	\$15.00
5/13/2019	Lexis Nexis	Lexis Nexis Legal Research	\$150.00
5/14/2019	LS	Certified Mail Certified Mail to Kurt Cassidy enclosing notice regarding violation of lease. Tracking #: 7005-1820-0005-0818-2526.	\$11.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Jun 12, 2019

Invoice Num: 2019-2093

Billing Through: May 31, 2019

KC Landscaping 1088.04 (KC Landscaping 1088.04:) - Managed by (RM)

Reimbursable Expenses:

Date	Employee	Description	Amount
5/14/2019	LS	Certified Mail Certified Mail to Kurt Cassidy regarding Notice to Quit and Holdover Tenancy. Tracking # : 7005-1820-0005-0818-2540	\$11.00
5/14/2019	LS	Certified Mail Certified Mail to Kurt Cassidy regarding Additional Rent Due. Tracking #: 7005-1820-0005-0818-2533	\$11.00
5/15/2019	LS	Motion filing fee for Complaint.	\$250.00
5/17/2019	Lexis Nexis	Lexis Nexis Legal Research	\$48.00
5/19/2019	Lexis Nexis	Lexis Nexis Legal Research	\$85.00
5/20/2019	Guaranteed Subpoena Service Inc.	Process Service Served Notice to Quit on Kurt Cassidy. Invoice# 20190514133615	\$65.00
5/21/2019	Lexis Nexis	Lexis Nexis Legal Research	\$80.00
5/30/2019	Lexis Nexis	Lexis Nexis Legal Research	\$155.00

Total Expenses: **\$1,230.65**

Amount Due This Invoice: **\$9,810.65**

Account Summary

Ref. Received	Ref. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2042	5/8/2019	\$5,315.90	\$5,315.90	\$0.00

Total Amount Due Including This Invoice: **\$9,810.65**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Invoice Date: Jun 12, 2019

Invoice Num: 2019-2074

Billing Through: May 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/3/2019	MG	Billable Time Meeting with prosecutor to obtain documents; reviewed and cataloged documents and made memo; listened to interviews with witnesses.	6.25	\$110.00	\$687.50
5/6/2019	MG	Billable Time Finalized memo summarizing documents provided by prosecutor during interviews.	2.00	\$110.00	\$220.00
5/14/2019	LS	Billable Time review of court docket re status of matter	3.50	\$110.00	\$385.00
5/17/2019	LS	Billable Time capture audio recordings from Borough recorder	0.50	\$110.00	\$55.00
5/17/2019	LS	Billable Time email to David Corrigan re recordings of meetings	0.25	\$110.00	\$27.50
5/17/2019	LS	Billable Time telephone call with Scott Selagy re discovery demands on Baginski and completion of deposition before tenure hearing	0.75	\$110.00	\$82.50
5/17/2019	LS	Billable Time email to client re conference with Selagy	0.25	\$110.00	\$27.50
5/17/2019	MG	Billable Time Emails regarding review of information related to tenure charges for L. Seaman	0.50	\$110.00	\$55.00
5/29/2019	LS	Billable Time notice from court re judge re-assignment	0.25	\$110.00	\$27.50

Total Service Amount: \$1,567.50

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
5/3/2019	County of Bergen	Doc. Fee Fee for copies of documents.	\$48.65

Total Expenses: \$48.65

Amount Due This Invoice: \$1,616.15

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Invoice Date: Jun 12, 2019

Invoice Num: 2019-2074

Billing Through: May 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Account Summary

Ref. Received	Ref. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2023	5/8/2019	\$852.50	\$852.50	\$0.00

Total Amount Due Including This Invoice: **\$1,616.15**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Invoice Date: Jun 12, 2019

Invoice Num: 2019-2086

Billing Through: May 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Fehl v. Wallington (Fehl v. Wallington 1088.15:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/16/2019	LS	Billable Time receipt and review of subpoenas on Corrigan and Tandy	0.50	\$110.00	\$55.00
5/16/2019	LS	Billable Time review of court docket and analysis of status of matter and claims against Borough	5.50	\$110.00	\$605.00
5/17/2019	LS	Billable Time email to client re analysis of status of file	1.00	\$110.00	\$110.00
5/20/2019	LS	Billable Time legal research re impact of Monell claim and collectible of cross-claims against Borough by co-defendants	3.50	\$110.00	\$385.00
5/20/2019	RM	Billable Time E-mail to Labor attorney regarding how discovery in this matter may have an impact on the tenure hearing.	1.00	\$110.00	\$110.00
5/30/2019	LS	Billable Time letter from counsel for plaintiff to court re permission to file discovery motion	0.25	\$110.00	\$27.50

Total Service Amount: **\$1,292.50**

Amount Due This Invoice: **\$1,292.50**

Account Summary

<u>Ret. Received</u>	<u>Ret. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-2033	5/8/2019	\$55.00	\$55.00	\$0.00

Total Amount Due Including This Invoice: **\$1,292.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Invoice Date: Jun 12, 2019

Invoice Num: 2019-2108

Billing Through: May 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -

Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/1/2019	MG	Billable Time Meeting with Borough Administrator regarding obtaining more documents; meeting/correspondence with former attorney, planning board attorney and zone code official regarding obtaining more documents.	3.50	\$110.00	\$385.00
5/2/2019	MG	Billable Time Work on Answer to Counterclaim; Work on obtaining responsive documents to discovery requests; adjust discovery responses in accordance with newly obtained documents.	4.25	\$110.00	\$467.50
5/3/2019	MG	Billable Time E-mail with Zoning Official regarding obtaining documents.	0.25	\$110.00	\$27.50
5/7/2019	MG	Billable Time Meeting with Zone Code Official to obtain documents for discovery; began reviewing extensive file for the Property; email to former attorney for additional responsive documents.	2.75	\$110.00	\$302.50
5/9/2019	MG	Billable Time Meeting with zoning official to obtain all documents; reviewed all zoning documents for property and adjusted discovery responses accordingly.	7.75	\$110.00	\$852.50
5/10/2019	MG	Billable Time Email with Martin Cedzidlo regarding transcript provided by opposition; meeting with Administrator confirming interrogatory answers; finalized and produced discovery.	3.50	\$110.00	\$385.00
5/14/2019	MG	Billable Time Meeting with Zone Code Official regarding any additional discovery.	0.75	\$110.00	\$82.50
5/17/2019	MG	Billable Time Email regarding custodian of records; assisted all parties in obtaining records.	0.50	\$110.00	\$55.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Jun 12, 2019

Invoice Num: 2019-2108

Billing Through: May 31, 2019

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02;) -

Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/20/2019	MG	Billable Time E-mails with opposing counsel regarding rescheduling of deposition.	0.25	\$110.00	\$27.50
5/28/2019	MG	Billable Time Reviewed documents regarding depositions; reviewed deficiency letter and began drafting response.	1.50	\$110.00	\$165.00
5/29/2019	MG	Billable Time E-mail with Martin Cedzidlo regarding Planning Board action on ordinance.	0.25	\$110.00	\$27.50
5/30/2019	MG	Billable Time E-mail to WREIT counsel regarding rescheduling depositions; e-mails to Wallington officials regarding depositions dates; meeting with administrator regarding deficiency letters response; continued drafting deficiency letter response.	4.00	\$110.00	\$440.00
5/31/2019	MG	Billable Time Completed response to deficiency letter; review of minutes for any testimony related to ordinance.	2.00	\$110.00	\$220.00

Total Service Amount: **\$3,437.50**

Amount Due This Invoice: **\$3,437.50**

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2056	5/8/2019	\$4,950.00	\$4,950.00	\$0.00

Total Amount Due Including This Invoice: **\$3,437.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: 201-440-0675 Fax: 201-440-1843

Invoice

Invoice Date: Jun 12, 2019

Invoice Num: 2019-2111

Billing Through: May 31, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Victor Polce v Wallington 1088.07 (Victor Polce v Wallington 1088.07:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/24/2019	LS	Billable Time receipt and review of Polce opposition to motion for summary judgment	1.50	\$110.00	\$165.00
5/24/2019	LS	Billable Time letter to court confirming dates for oral argument on motion for summary judgement	0.50	\$110.00	\$55.00
5/24/2019	LS	Billable Time legal research re doctrine of regularity and provisions for discovery from members of legislative body for reply in support of motion for summary judgement	2.50	\$110.00	\$275.00
5/24/2019	LS	Billable Time letter brief to court re reply in support of motion for summary judgment	1.00	\$110.00	\$110.00
5/24/2019	LS	Billable Time email to client re opposition and reply on motion for summary judgment	0.50	\$110.00	\$55.00
5/28/2019	LS	Billable Time file review in preparation for oral argument on motion for summary judgment	3.00	\$110.00	\$330.00
5/29/2019	LS	Billable Time attend court for oral argument on motion for summary judgment	3.00	\$110.00	\$330.00

Total Service Amount: **\$1,320.00**

Amount Due This Invoice: **\$1,320.00**

Account Summary

<u>Ret. Received</u>	<u>Ret. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-2059	5/8/2019	\$1,585.00	\$1,585.00	\$0.00

Total Amount Due Including This Invoice: **\$1,320.00**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Apr 17, 2019

Invoice Num: 2019-1978

Billing Through: Mar 31, 2019

Baginski v. Wallington (Baginski v. Wallington 1088.12:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/7/2019	RM	Billable Time Discussion with counsel for the council candidates in the pending civil rights case brought by the terminated borough clerk.	0.75	\$110.00	\$82.50
3/21/2019	LS	Billable Time prepare and file notice of appearance in Baginski v Wallington civil rights action	0.50	\$110.00	\$55.00
3/21/2019	LS	Billable Time conference call with court re discovery schedule in Baginski federal civil rights action	0.25	\$110.00	\$27.50
3/21/2019	LS	Billable Time file review in preparation for case management conference in Baginski federal civil rights action	0.50	\$110.00	\$55.00
3/23/2019	RM	Billable Time E-mails with Labor counsel regarding Baginski law suit and tenure charges.	0.25	\$110.00	\$27.50
3/25/2019	RM	Billable Time Bakinski lawsuit and tenure charges: telecon with labor counsel and two attorneys assigned to defend through the JIF; review subpoena to prosecutor's office and amended complaint. discussions of strategies in handling cases and getting information necessary for the defense.	1.50	\$110.00	\$165.00
3/26/2019	RM	Billable Time Wiltod Baginski v. Wallington: e-mails and telecoms with prosecutor's office in an attempt to obtain investigation file on Baginski.	1.00	\$110.00	\$110.00

Total Service Amount: **\$522.50**

Amount Due This Invoice: **\$522.50**

Account Summary

Ref. Received	Ref. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	--	--	\$0.00	\$0.00	\$0.00

Total Amount Due Including This Invoice: **\$522.50**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: May 8, 2019

Invoice Num: 2019-2056

Billing Through: Apr 30, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
4/1/2019	MG	Billable Time Edited Amended Complaint; conference with R. Malagiere regarding document production; telephone call with borough administrator regarding outstanding documents.	5.00	\$110.00	\$550.00
4/2/2019	MG	Billable Time Reviewed information filed in Complaint regarding 380 Mount Pleasant.	2.25	\$110.00	\$247.50
4/2/2019	MG	Billable Time Collected and reviewed new documents from Borough Administrator.	1.75	\$110.00	\$192.50
4/4/2019	MG	Billable Time Conference with R. Malagiere regarding strategy on amending answer; research on affirmative defenses and edits to amended answer; finalized receiving documents from Borough.	4.00	\$110.00	\$440.00
4/5/2019	MG	Billable Time Drafted Answer to Complaint.	4.25	\$110.00	\$467.50
4/9/2019	RM	Billable Time Meeting with lawyers for Doka to discuss possible settlement.	1.00	\$110.00	\$110.00
4/12/2019	MG	Billable Time Conference with R. Malagiere regarding Answer to Complaint; revised Answer.	2.00	\$110.00	\$220.00
4/19/2019	MG	Billable Time Revisions to Answer.	1.00	\$110.00	\$110.00
4/22/2019	MG	Billable Time Revised Answer as per Richard Malagiere instructions; e-mails with tax appeal attorney regarding review of complaint in relation to other appeals.	2.50	\$110.00	\$275.00
4/23/2019	MG	Billable Time E-mails and telephone conference with Paul Elias regarding strategy on Answer to Complaint.	0.50	\$110.00	\$55.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: May 8, 2019

Invoice Num: 2019-2056

Billing Through: Apr 30, 2019

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
4/23/2019	MG	Billable Time Conference with Richard Malagiere regarding supplementing interrogatories; work on obtaining additional information.	1.75	\$110.00	\$192.50
4/25/2019	MG	Billable Time Supplementing discovery.	4.25	\$110.00	\$467.50
4/26/2019	MG	Billable Time Telephone conference with Planning Board attorney regarding obtaining documents; supplementing and revised discovery.	3.25	\$110.00	\$357.50
4/29/2019	MG	Billable Time Final draft of supplemented discovery responses.	2.50	\$110.00	\$275.00
4/29/2019	MG	Billable Time Finalized draft of supplemented discovery responses.	2.50	\$110.00	\$275.00
4/30/2019	MG	Billable Time Conference with R. Malagiere regarding supplemental discovery; work on supplemental discovery; began work on answer to counterclaim.	3.25	\$110.00	\$357.50
4/30/2019	MG	Billable Time Conference with Richard Malagiere regarding supplemental discovery; began work on answer to Counterclaim.	3.25	\$110.00	\$357.50

Total Service Amount: **\$4,950.00**

Amount Due This Invoice: **\$4,950.00**

Account Summary

Ret. Received	Ret. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	2019-2010	4/17/2019	\$1,705.00	\$2,152.50	\$1,705.00

Total Amount Due Including This Invoice: **\$6,655.00**

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Mar 8, 2019

Invoice Num: 2019-1966

Billing Through: Feb 28, 2019

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02:) - Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
2/6/2019	MG	Billable Time Reviewed documents provided by WRIET attorney regarding UMDASCH case; prepared substitution of attorney on case; reviewed all documents on case; prepared memo.	5.25	\$110.00	\$577.50
2/7/2019	MG	Billable Time Filed substitution of attorney; drafted letter to opposing counsel regarding substitution; emails with opposing counsel.	0.50	\$110.00	\$55.00
2/8/2019	MG	Billable Time Created comprehensive memo analyzing the counts laid out in Complaint.	3.00	\$110.00	\$330.00
2/8/2019	LS	Billable Time review and revise documents re substitution	1.00	\$110.00	\$110.00
2/11/2019	MG	Billable Time Drafted withdrawal certification and sent to Richard Cedizidio; drafted proposed Answer to Amended Complaint; began work on discovery.	3.00	\$110.00	\$330.00
2/13/2019	MG	Billable Time E-mail to opposing counsel regarding substitution; Telephone conference with opposing counsel regarding case status; filed all documents for substitution; work on answering discovery.	2.00	\$110.00	\$220.00
2/22/2019	MG	Billable Time Reviewed new documents received from intervenor.	1.25	\$110.00	\$137.50
2/27/2019	MG	Billable Time E-mail to borough administrators requesting ordinance; prepared evaluative memo of parties' positions.	2.25	\$110.00	\$247.50
2/28/2019	MG	Billable Time Completed evaluative memo and documented all deadlines outstanding.	1.00	\$110.00	\$110.00

Total Service Amount: \$2,117.50

Reimbursable Expenses:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
2/14/2019	MG	filing fee filing fee for substitution of attorney.	\$35.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Invoice Date: Mar 8, 2019

Invoice Num: 2019-1966

Billing Through: Feb 28, 2019

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02) -
Managed by (RM)

Total Expenses: \$35.00

Amount Due This Invoice: \$2,152.50

Account Summary

Ref. Received	Ref. Applied	Retainer Left	Last Inv Num	Last Inv Date	Last Inv Amt	Last Pay Amt	Prev Unpaid Amt
\$0.00	\$0.00	\$0.00	--	--	\$0.00	\$0.00	\$0.00

Total Amount Due Including This Invoice: \$2,152.50

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Apr 17, 2019

Invoice Num: 2019-2010

Billing Through: Mar 31, 2019

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02;) -

Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/1/2019	MG	Billable Time Conference with Richard Malagiere regarding case status; additional work related to meeting deadlines; reviewed statutes cited in amended complaint.	1.50	\$110.00	\$165.00
3/6/2019	MG	Billable Time Collected information and answer discovery demands.	2.00	\$110.00	\$220.00
3/6/2019	MG	Billable Time Completed draft responses to interrogatories.	2.00	\$110.00	\$220.00
3/8/2019	RM	Billable Time Meeting with the attorney for the Plaintiff to discuss case.	1.00	\$110.00	\$110.00
3/8/2019	RM	Billable Time Discussion with intervenor counsel.	0.50	\$110.00	\$55.00
3/19/2019	MG	Billable Time Collected documents for discovery responses.	1.50	\$110.00	\$165.00
3/26/2019	RM	Billable Time Telecom with DOKA's lawyer regarding outstanding discovery responses, requesting an amended case mgt order and DOKA's property and its use in general.	0.50	\$110.00	\$55.00
3/26/2019	MG	Billable Time Conference with Richard Malagiere regarding collecting documents for discovery; meeting with Borough Administrator regarding collecting document; began compiling documents.	2.00	\$110.00	\$220.00
3/27/2019	MG	Billable Time Continued responses to document demands and acquiring documents.	1.00	\$110.00	\$110.00
3/28/2019	MG	Billable Time Conference with Richard Malagiere regarding discovery; continued work on document production; revised interrogatories as per conference with Richard Malagiere.	1.00	\$110.00	\$110.00
3/29/2019	MG	Billable Time Continued work on compiling documents and revising and adding to interrogatory answers.	1.00	\$110.00	\$110.00

The Law Offices of Richard Malagiere

A Professional Corporation, 250 Moonachie Road, Suite 102

Moonachie, NJ 07074

Tel: (201) 440-0675 Fax: (201) 440-1843

Invoice

Borough of Wallington
Attn: Hector Olmo, Administrator
24 Union Boulevard
Wallington, NJ 07057

Invoice Date: Apr 17, 2019
Invoice Num: 2019-2010
Billing Through: Mar 31, 2019

UMDASCH Real Estate USA v Bor. of Wallington 1088.02 (UMDASCH Real Estate USA v Bor. of Wallington 1088.02;) -
Managed by (RM)

Professional Services

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/31/2019	MG	Billable Time	1.50	\$110.00	\$165.00
		Finalized Discovery responses.			

Total Service Amount: \$1,705.00

Amount Due This Invoice: \$1,705.00

Account Summary

<u>Ret. Received</u>	<u>Ret. Applied</u>	<u>Retainer Left</u>	<u>Last Inv Num</u>	<u>Last Inv Date</u>	<u>Last Inv Amt</u>	<u>Last Pay Amt</u>	<u>Prev Unpaid Amt</u>
\$0.00	\$0.00	\$0.00	2019-1966	3/8/2019	\$2,152.50	\$2,152.50	\$0.00

Total Amount Due Including This Invoice: \$1,705.00

Retention and Coinsurance Invoice (2)

Payment Due Date: 3/17/2020

TO: Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Invoice Date:	2/17/2020
Claim Number:	QM-1437
Claimant:	Polce, Victor
Policy #:	QJP0102603

Policy Retention/Coinsurance Amount	Invoice Amount Paid	Reimbursement Payment <u>Due From Borough of Wallington</u>
\$10,000.00/\$20,000.00	\$160.00	<u>\$160.00</u>

Payment Summary:

Retention Obligation paid to date by the Borough: \$5,464.74

Please make check payable to: QBE Specialty Insurance Company

Send Payment To: Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Att: Michael Halbherr

PLEASE INCLUDE THE CLAIM NUMBER ON ALL REMITTANCES TO ENSURE PROPER CREDIT

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

September 05, 2019

Invoice No. 2241

Summit Risk Services
Ryan Thomas
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4935 Polce v. Borough of Wallington

Claim Number: QM-1437

File Number: 24-4935

For Services Rendered Through 8/31/2019.

Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
6/7/2019	JB	draft initial 90 day report to Company	0.80	\$112.00
6/17/2019	MM	telephone conference with company re: case evaluation	0.20	\$32.00
7/8/2019	DP	Receipt and review partial dismissal notice from Court	0.10	\$16.00
Billable Hours / Fees:			<u>1.10</u>	<u>\$160.00</u>

Timekeeper Summary

Timekeeper JB worked 0.80 hours at \$140.00 per hour, totaling \$112.00.

Timekeeper DP worked 0.10 hours at \$160.00 per hour, totaling \$16.00.

Timekeeper MM worked 0.20 hours at \$160.00 per hour, totaling \$32.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
5/29/2019	Travel Expenses - parking at Bergen County Courthouse	\$5.00	
5/29/2019	Travel Expenses - mileage to Bergen County Courthouse for oral argument	\$11.60	

Continued On Next Page

Client Number: 20972024
Matter Number: 4935

9/5/2019
Page: 2

Total Costs \$16.60

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
8/2/2019	Check Number - 7305 against Inv# 1893	(\$1,831.50)
8/2/2019	Check Number - 7306 against Inv# 1959	(\$787.50)
8/2/2019	Check Number - 7306 against Inv# 1959	(\$4.00)
Total Payments Received:		<u>(\$2,623.00)</u>

Current Invoice Summary

Prior Balance:	\$2,623.00	Last Payment: 8/2/2019
Payments Received:	(\$2,623.00)	
Unpaid Prior Balance:	<u>\$0.00</u>	
Current Fees:	\$160.00	
Advanced Costs:	\$16.60	
TOTAL AMOUNT DUE:	<u><u>\$176.60</u></u>	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.



Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

February 17, 2020

Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Att: Hector Olmo

Re:	Insured:	Borough of Wallington
	Claimant:	Polce, Victor
	Policy No:	QJP0102603
	Claim No.:	QM-1437

Dear Mr. Olmo,

Summit Risk Services is the Third Party Administrator on behalf of the QBE Specialty Insurance Company.

Enclosed please find for payment, QBE Specialty Insurance Company's invoice relative to the Insured's retention and coinsurance obligations to date.

Unless we hear back from you to the contrary, we will assume that the attached invoice will be paid by the Insured within 30 days.

Please be reminded that you can contact your JIF Claims Coordinator for details relative to a deferred deductible and copayment plan which has been adopted by your local JIF.

Please feel free to contact the assigned adjuster Michael Halbherr at 215-443-3599 or halbherr@summitrisk.com, should you have any questions.

We appreciate your prompt attention to this matter.

Sincerely,
Summit Risk Services
Alice Ivers for Michael Halbherr

cc: Paul Barbire, Esq.
Solicitor

Coinsurance Invoice (8)**Payment Due Date: 3/17/2020**

TO: Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Invoice Date:	2/17/2020
Claim Number:	QM-0708
Claimant:	Baginski, Witold
Policy #:	QJP0102601

Policy Retention/Coinsurance Amount	Invoice Amount Paid	Reimbursement Payment Due From Borough of Wallington
\$10,000.00/\$20,000.00	\$10,350.00 \$ 2,100.00 \$ 5,320.00 \$ 1,847.00	<u>\$3,923.40</u> 20% coinsurance obligation

Payment Summary:

Retention Obligation paid by the Borough: \$10,000.00

Coinsurance Obligation paid to date by the Borough: \$14,883.32

Please make check payable to: QBE Specialty Insurance Company

Send Payment To: Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Att: Alen Arnautovic**PLEASE INCLUDE THE CLAIM NUMBER ON ALL REMITTANCES TO ENSURE PROPER CREDIT**

Keenan & Doris

Attorneys at Law

71 Union Avenue, Suite 105, Rutherford, NJ 07070
[phone] 201-355-8110 [Fax] 201-355-8118

INVOICE

Date August 23, 2019
File No. 1005-47
Invoice No. 1945

Summit Risk Services
220 Gibraltar Road, Suite 100
Horsham, Pennsylvania
19044

Attention: Jamie C. Tomas

RE: Baginski v. Borough of Wallington
Claim No. QM-0708

Professional services rendered from November 1, 2018 through July 31, 2019

SERVICES

Date	Description	Hrs
Nov-02-18	TOC Telephone call to Business administrator regarding outstanding discovery requests	0.20
	TOC Comprehensive file review file in preparation of Plaintiff's deposition	2.40
Nov-07-18	TOC Telephone conference with co-defendant regarding deposition strategy and outline	1.60
	TOC Emails from co-defendant's counsel and plaintiff's counsel confirming deposition of Plaintiff for tomorrow	0.20
	TOC Receipt and review of letter from Plaintiff's counsel making new allegations of deprivation of Plaintiff's rights by Borough Administrator	0.40
	TOC Telephone conference with co-defendant's counsel regarding adjourning deposition and analysis of new allegations against Borough administrator	0.70
	TOC Emails to adjustor regarding new allegations against Borough Administrator	0.20
Nov-08-18	TOC Telephone conference with adjustor regarding potential new claims	0.40
	TOC Receipt, review and analysis of letter to court from Plaintiff's counsel regarding pleadings	0.30

August 23, 2019

Invoice #: 1945

Page 2

Nov-12-18	TOC	Telephone conference with Plaintiff's counsel regarding new allegations and upcoming conference call with Judge	0.80
	TOC	Receipt, review and analysis of correspondence and e-mail from Plaintiff's counsel regarding e-mail to the Chief of Police from BA regarding Plaintiff's sick leave	0.30
	TOC	Telephone call to client, Victor Polce regarding the new allegations and scheduling a meeting to discuss further discovery	0.30
	TOC	Emails to client, Victor Polce, regarding meeting to complete discovery	0.10
	TOC	Receipt, review and analysis of copy of e-mail from Victor Polce to Chief of Police regarding Plaintiff's election day activities	0.30
Nov-19-18	TOC	Review of outstanding discovery in advance of meeting with Borough Administrator Polce	1.20
	TOC	Revision of draft answers to Co-Defendant's notice to produce in advance of meeting with Borough administrator Polce	0.40
	TOC	Attendance at,discovery meeting with Borough Administrator Victor Polce	2.50
	TOC	Emails to Borough Administrator Polce regarding outstanding discover document demands (multiple e-mails)	0.30
Nov-26-18	TOC	Telephone conference with Co-Defendant's counsel regarding response letter to Plaintiff's letter to court	0.40
	TOC	Drafting Letter to court regarding scheduling discovery following new allegations	0.60
	TOC	Emails to and from Co-Defendant's counsel with drafts of letter to court, per court order	0.30
	TOC	Receipt and review of Co-Defendant's letter to court per court order	0.20
	TOC	eCourts filing: Letter to Court responding to Plaintiff's Letter, per court order	0.20
Nov-29-18	TOC	Receipt, review and analysis of Order of Judge Dickson	0.30
	TOC	Telephone conference with Co-Defendant's counsel regarding outstanding discovery pursuant to Judge Dickson's Order	0.70
Nov-30-18	TOC	Telephone conference with Co-Defendant's counsel regarding plaintiff's deposition	0.40
	TOC	Receipt and review of e-mail from Co-Defendant's counsel with Plaintiff's deposition notice	0.20

Dec-06-18	TOC	Telephone conference with Co-Defendant's counsel regarding future discovery	0.40
	TOC	Comprehensive file review in preparation for drafting updated Litigation Loss Report	0.80
Dec-07-18	TOC	Preparation of updated Litigation Loss Report	1.60
Dec-10-18	TOC	Receipt and review of e-mail from Plaintiff's counsel regarding new allegations of retaliatory behavior	0.30
	TOC	Emails to client, regarding Plaintiff's counsel's new allegations of retaliatory behavior	0.20
Dec-12-18	TOC	Review and revision of draft updated Litigation Loss Report	0.40
	TOC	Emails from Plaintiff's counsel with demand for documents and notice of continued retaliatory behavior from client	0.20
	TOC	Telephone conference with Co-Defendants' counsel regarding strategy to respond to continued e-mails from Plaintiff's counsel regarding continuing allegations of retaliatory behavior	0.40
	TOC	Telephone call to client, Victor Polce, regarding allegations of locking out Plaintiff from his computer	0.40
	TOC	Emails to and from Plaintiff's counsel informing Plaintiff of our position that Plaintiff is responsible for his computer access	0.20
Dec-13-18	TOC	Receipt and review of Statement from Borough IT head regarding timeline for previous delivery of computer password to Plaintiff and Plaintiff's statements	0.30
	TOC	Emails to and from Borough administrator and Borough IT personnel regarding Plaintiff's computer password and delivery thereto	0.60
	TOC	Emails to Plaintiff's counsel with statement from Borough IT head regarding Plaintiff's computer password	0.40
Jan-07-19	TOC	Emails to Co-Defendant's counsel regarding firing of Borough Administrator	0.10
	TOC	Telephone conference with Co-Defendant's counsel regarding firing of Borough Administrator	1.10
	TOC	Telephone conference with Jane Fontana, Acting Borough Administrator	0.20
Jan-08-19	TOC	Comprehensive file review in preparation for telephone status conference with Judge Dickson	1.00
	TOC	Emails to and from Co-Defendant's and Plaintiff's counsels regarding conference call with Judge Dickson	0.30

	TOC	Participation in telephone status conference with Judge Dickson	0.40
	TOC	Telephone conference with Co-Defendant's counsel following conference with Judge Dickson regarding potential for opposition to Plaintiff's Amended Complaint	0.60
	TOC	Telephone conference with adjustor following conference with Judge Dickson and receipt of Plaintiff's Amended Complaint	0.20
	TOC	Receipt, review and analysis of draft of Plaintiff's Amended Complaint	0.90
	TOC	Telephone conference with new acting Borough Administrator Jane Fontana following conference with Judge Dickson	0.40
	TOC	Preparation of initial draft of updated Status Report	1.10
Jan-09-19	TOC	Legal Research into Family Medical Leave Act	1.20
	TOC	Emails to and from Co-Defendant's counsel regarding new counts of Plaintiff's amended complaint and FMLA	0.40
Jan-10-19	TOC	Review and revision of draft Status Report with addition of new information and analysis pursuant to legal research into FMLA	0.80
	TOC	Emails to adjustor with status report	0.20
Jan-14-19	TOC	Emails to and from co-defendant's counsel regarding decision not to oppose motion to amend complaint	0.20
	TOC	Telephone conference with co-defendant's counsel regarding potential opposition to Plaintiff's Amended Complaint	0.50
	TOC	Emails to and from Plaintiff's counsel consenting to their amended complaint	0.30
Jan-18-19	TOC	Receipt, review and analysis of filed Amended Complaint with comparison to previously reviewed draft Amended Complaint	0.50
	TOC	Emails to and from adjustor regarding new Borough Administrator	0.10
	TOC	Emails to and from counsels for Plaintiff and Co-Defendant regarding filling of amended complaint	0.30
Feb-04-19	TOC	Telephone conference with Co-Defendant's counsel regarding Answer to Amended Complaint	0.50
	TOC	Receipt, review and analysis of Co-Defendant's Answer to Amended Complaint	0.50
Feb-05-19	TOC	Receipt, review and analysis of subpoena by Plaintiff's counsel regarding Town Council Meetings served upon Donald Nuckel	0.40

August 23, 2019

Invoice #: 1945

Page 5

	TOC	Emails from Co-Defendant's counsel and Plaintiff's counsel regarding HIPAA Authorizations and notice of deposition of Plaintiff	0.30
	TOC	Telephone conference with claims adjuster regarding conflict of interest	0.20
Feb-08-19	TOC	Comprehensive file review in preparation for drafting updated Status -Litigation Loss Report	0.80
	TOC	Preparation of updated Litigation Loss Report	1.50
Feb-12-19	TOC	Preparation of Answer to Amended Complaint	1.50
Feb-13-19	TOC	Telephone conference with claims representative regarding outside counsel for newly named individual defendant	0.20
	TOC	Telephone conference with Co-Defendant Polce's new counsel	0.30
	TOC	Emails to and from Co-Defendant Polce's new counsel regarding previously submitted discovery	0.20
Feb-15-19	TOC	Review of file regarding mediation readiness -potential scheduling of mediation session	0.50
	TOC	Telephone conference with Borough Labor Attorney regarding Plaintiff's tenure charges	0.10
	TOC	Review and revision of draft updated Litigation Loss Report	0.50
	TOC	Emails to Claims Representative with Status Report and mediation plan	0.20
	TOC	Revision of Answer to Amended Complaint	0.60
Feb-18-19	TOC	Emails to and from all counsels regarding results of Subpoena on Nuckel	0.40
Feb-26-19	TOC	Telephone conference with Borough's Labor Attorney regarding time frame for tenure charges	0.30
	TOC	Telephone conference with Borough Administrator regarding mediation potential	0.10
Mar-12-19	TOC	Emails to and from Claims Representative regarding new Borough Administrator	0.20
	TOC	Telephone conference with Co-Defendant's counsel regarding upcoming deposition and strategy for mediation	0.50
	TOC	Telephone conference with new Borough Administrator, Hector Olmo, introduction to the case	0.40

August 23, 2019

Invoice #: 1945

Page 6

Mar-19-19	TOC	Telephone conference with Labor Counsel for Borough of Wallington regarding potential stay of case	0.30
Mar-20-19	TOC	Telephone conference with Borough Administrator regarding litigation and discovery status	0.20
	TOC	Telephone conference with Borough Labor Attorney	0.20
	TOC	Review of file for outstanding discovery and case status in advance of telephone conference with Judge Dickson	0.70
Mar-21-19	TOC	Telephone conference with Federal Magistrate Dickson and all parties regarding case scheduling	0.50
	TOC	Telephone conference with Co-Defendant's counsel Seelagy regarding case strategy (3 phone calls)	1.30
	TOC	Emails to and from all parties' attorneys regarding conference call with Judge Dickson	0.20
	TOC	Telephone conference with new Borough Attorney regarding mediation potential; strategy for same	0.20
	TOC	Meeting with client: New Borough Administrator Hector Olmo and Borough Labor Attorney David Corrigan regarding case strategy, mediation potential, and outstanding discovery	1.90
	TOC	Review of pleadings and discovery to date in advance of meeting with client	1.10
Mar-25-19	TOC	Telephone conference with Borough Attorney, Richard Malagiere, regarding potential for mediation; strategy for same	0.50
	TOC	Receipt and review of Co-Defendant's subpoena served upon the Prosecutor's Office	0.20
Apr-01-19	TOC	Telephone conference with Judge Dickson's chambers regarding status of discovery order	0.20
	TOC	Emails to All counsel regarding status of discovery order (6 e-mails)	0.30
	TOC	Receipt and review of Plaintiff's proposed discovery order	0.30
	TOC	Telephone conference with Co-Defendant's Counsel regarding Plaintiff's proposed discovery order	0.50
Apr-02-19	TOC	Emails from Co-Defendants' Counsel and Plaintiff regarding filed discovery order	0.20
	TOC	Receipt, review and analysis of filed discovery Order	0.20
Apr-03-19	TOC	Receipt, review and analysis of records from client, Plaintiff's payroll information (220 pages)	1.50

August 23, 2019

Invoice #: 1945

Page 7

Apr-05-19	TOC	Receipt and review of document requests from Mary McDonnell, Esq. in relation to Fehl v. Wallington 2:17-cv-11462, requesting documents related to this litigation	0.30
	TOC	Telephone conference with Borough Administrator regarding document requests in other litigation	0.30
	TOC	Telephone conference with Mary McDonnell, Esq regarding document requests for documents related to this litigation in other law suit against Wallington	0.30
Apr-09-19	TOC	Receipt and review of letter from Borough Labor Attorney regarding status of pending tenure charges against Plaintiff and potential repercussions with respect to this matter	0.30
	TOC	Review of discovery served to date, in preparation of forwarding same to Borough Labor Attorney, per his request	0.50
	TOC	Emails to and from Borough Labor Attorney and co-defendants' counsels regarding discovery to date and strategy moving forward	0.20
Apr-11-19	TOC	Telephone conference with Co-Defendant's attorney regarding strategy in the case and mediation potential	1.20
Apr-12-19	ICD	Legal Research Estoppel issues regarding Administrative hearings and findings	1.60
Apr-16-19	TOC	Receipt, review and analysis of Co-Defendant's second set of interrogatories on Plaintiff	0.70
	TOC	Telephone conference with Co-Defendant's counsel regarding discovery and mediation with respect to his conversation with Borough Attorney	0.90
Apr-17-19	TOC	Preparation of documents and response to Mary McDonnell, Esq. regarding documents to be turned over in Fehl v. Wallington	1.10
Apr-24-19	TOC	Receipt, review and analysis of Status Report from Borough Labor Attorney on Plaintiff's tenure charges administrative hearing	0.40
Apr-26-19	TOC	Emails to claims representative regarding case status and appropriateness of mediation	0.30
Apr-29-19	ICD	Telephone conference with adjustor regarding status of case	0.20
May-13-19	TOC	Emails from claims representative regarding case status update	0.10
	TOC	Comprehensive file review in preparation for drafting updated Status-Litigation loss Report	0.70
	TOC	Preparation of updated Litigation loss Report	1.50
May-14-19	TOC	Email to claims representative with updated Litigation Loss Report	0.10

August 23, 2019

Invoice #: 1945

Page 8

	TOC	Review and revision of draft updated Status - Litigation Loss Report	0.30
Jun-10-19	TOC	Telephone conference with co-defendant's counsel regarding case strategy for depositions and mediation	0.30
Jun-11-19	TOC	Receipt, review and analysis of Deposition notice for Plaintiff from Co-Defendant's counsel; and good faith notice for outstanding discovery	0.30
Jun-17-19	TOC	Telephone conference with Co-Defendant's counsel regarding strategy for upcoming telephone conference with Judge Dickson	0.30
	TOC	Review of file and case status in advance of telephone conference with Judge Bannon	0.50
	TOC	Emails from Plaintiff's counsel regarding upcoming telephone conference with Judge Bannon	0.20
Jun-18-19	TOC	Receipt, review and analysis of Plaintiff's responses to Co-Defendant's Second Set of Interrogatories	1.80
	TOC	Emails from Plaintiff's counsel regarding responses to Co-Defendant's discovery requests	0.20
Jun-19-19	TOC	Telephone conference with Co-defendant's counsel regarding analysis of recent discovery responses and case strategy for upcoming conference call with Judge Bannon	0.50
	TOC	Participation in telephone status conference with Judge Bannon	0.40
	TOC	Receipt, review and analysis of video tape of December 11, 2018 town council meeting produced by Plaintiff in discovery	1.50
Jun-20-19	TOC	Review of 1/4/18 Town Council Re-organization meeting video tape as produced by Plaintiff in their responses to Co-Defendant's second notice to produce	2.40
	TOC	Review of document production by Plaintiff in response to Co-Defendant's Second Notice to Produce (637 pages)	4.10
Jun-25-19	ICD	Receipt, review and analysis of new Appellate Division cases regarding settlement and public officials and employees to determine impact on any potential settlement discussions	0.90
Jun-26-19	TOC	Preparation of Status Report following review of Plaintiff's responses to Co-Defendant's Second NTP	1.50
Jun-27-19	TOC	Review and revision of draft updated Status Report	0.50
	TOC	Emails to claims representative with status report	0.20
Jul-09-19	TOC	Telephone conference with Co-Defendant's counsel regarding strategy for Plaintiff's upcoming deposition	0.50

August 23, 2019
 Invoice #: 1945
 Page 9

Jul-10-19	TOC	Emails from Co-Defendant's counsel regarding Plaintiff's deposition	0.20
Jul-12-19	ICD	Review of new Appellate Division case on continuing pattern of harassment and its potential application to the case	0.70
	TOC	Telephone conference with Co-Defendant's counsel regarding strategy planning for Plaintiff's deposition and other Defendant' depositions	0.50
Jul-17-19	TOC	Comprehensive file review for outstanding discovery	0.80
	TOC	Drafting affidavit for Borough IT personnel	0.50
	TOC	Telephone call to client: Borough IT head Douglas Neumetzger	0.30
	TOC	Emails to and from client, Borough IT head Douglas Neumetzger, requesting additional documents per prior phone call	0.30
Jul-30-19	TOC	Emails to client, head of IT, regarding Plaintiff's e-mails requested previously	0.20
	TOC	Receipt, review and analysis of Emails from Co-Defendant Dabal regarding Plaintiff's water usage and resultant tenure charges (with attachments)	0.90
Jul-31-19	TOC	Emails to Borough IT head regarding outstanding discovery, i.e. missing e-mails not included in previous batch	0.30
Total professional services rendered			85.40
Total Fee & Disbursements			\$10,350.00
Previous Balance			6,789.90
Previous Payments			6,789.90
Balance Now Due			\$10,350.00

PAYMENT DETAILS

Mar-20-19	Fees for Professional Services Apex Ck#6168			6,789.90
Fee Summary:				
Lawyer	Hours	Rate	Amount	
Ian C. Doris	3.40	\$150.00	\$510.00	
Timothy O'Connor	82.00	\$120.00	\$9,840.00	

LAW OFFICE OF ROBERT J. GREENBAUM

Attorneys at Law
263 Winding Hill Drive
P.O. Box 446
Hackettstown, New Jersey 07840

(908) 684/4004
Fax (908) 684/4009
Robgreenbaum@Yahoo.com

November 1, 2019

Via Email (Bustamante@Summitrisk.com)

Jamie Bustamante
Summit Risk Services

Re: Baginski v. Wallington
Docket No.: 2:17-cv-05300-JLL-JAD
Claim No. QM-0708

INVOICE/

<u>Date</u>	<u>Description</u>	<u>Time</u>	<u>Rate</u>	<u>Value</u>
10/1/19	Prep. corresp. to client	.2	150	30.00
10/15/19	Receipt and review of corresp. from S. Seelagy re dep. of Plaintiff	.2	150	30.00
10/15/19	Prep. for dep. of plaintiff	2.2	150	330.00
10/15/19	Receipt and review of response of plaintiff	.2	150	30.00
10/15/19	Receipt and review of reply of T. O'Connor	.2	150	30.00
10/15/19	Prep. reply to S. Seelagy re dep. of plaintiff	.2	150	30.00
10/16/19	Attend deposition of plaintiff	8.5	150	1275.00
10/23/19	Receipt and review of corresp. from S. Seelagy re Continued dep. of plaintiff	.2	150	30.00
10/23/19	Prep. response to S. Seelagy	.2	150	30.00
10/23/19	Receipt and review of response from S. Seelagy	.2	150	30.00
10/23/19	Receipt and review of response from T. O'Connor	.2	150	30.00
10/28/19	Receipt and review of corresp. from S. Seelagy re Continued dep. of plaintiff	.2	150	30.00
10/30/19	Receipt and review of corresp. from S. Seelagy to Plaintiff re dep. of plaintiff	.2	150	30.00
10/31/19	Review notes from first day of deposition; Prepare Outline of additional testimony	1.1	150	165.00
TOTALS		14.0	150	2100.00

EXPENSES

TOTAL DUE

\$2100.00

Very truly yours,

/s/ Robert J. Greenbaum
ROBERT J. GREENBAUM

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4205

Client: QBE TPAS (Non - GB/York/Sedgwick)
Client Invoice ID: 4205
Matter Name: Witold Baginski v. Borough of Wallington, et als
Date of Loss: 03/24/2017
Claim Number(s): QM-0708
Insured Name(s): Borough of Wallington, n/a
Claim Professional: Jamie Bustamente
Claim Office: Summit
Product Line: Employment Discrimination
Firm Tax ID (FEIN): 223265664
Firm Name: Scott K. Seelagy, Esq.
Firm Address: 95 Spring Brook Road , Morristown, NJ 07960

Firm Phone: 973-670-1557x
Firm Fax: 201-508-1557
Firm File Number: 2017-1
Firm Invoice Number: 2019-4
Firm Invoice Date: 10/25/2019
Invoice Activity Period: 04/01/2019 to 06/27/2019
Total Fees: 5,353.00
Total Expenses: 0.00
Total Hours Billed: 33.50
Comments for firm:
Receipt Date: 10/25/2019
Release Date: 11/04/2019 08:08 AM

Timekeeper Summary

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
SKS (Seelagy, Scott)	160.00	32.80	5,248.00
SKS (Seelagy, Scott)	150.00	0.70	105.00

Bill Analysis Summary

	<u>Billed</u>	<u>Deductions</u>	<u>Credits</u>	<u>Overrides</u>	<u>Shared Amount</u>	<u>Tax Amount</u>	<u>To Pay</u>
Fees	5,353.00	33.00	0.00	0.00	5,320.00	0.00	5,320.00
Expenses	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals	5,353.00	33.00	0.00	0.00	5,320.00	0.00	5,320.00

Bill Analysis Details

#	Date	Task	TK	Narrative	Units	Rate	Amount	Type	Charge Type
---	------	------	----	-----------	-------	------	--------	------	-------------

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4205

#	Date	Task	TK	Narrative	Units	Rate	Amount	Type	Charge Type
1	04/01/2019	L234	SKS	Telephone conference with Mr. O Connor regarding dates for the completion of discovery, the deposition of plaintiff, the claims contained in the Amended Complaint and defense strategy.	0.10	150.0000	15.00	Fee	U
2	04/01/2019	L118	SKS	Receipt and review of email from Mr. O'Conner regarding the Court's request for dates from the parties for the completion of discovery.	0.60	150.0000	90.00	Fee	U
3	04/01/2019	L214	SKS	Receipt and review of two separate emails from plaintiffs counsel transmitting a proposed Joint Discovery Plan.	0.20	160.0000	32.00	Fee	U
4	04/01/2019	L204	SKS	Receipt and review of email from counsel for defendant Polce consenting to the form of the Joint Discovery Plan, and consent to file same with the Court.	0.10	160.0000	16.00	Fee	U
5	04/01/2019	L328	SKS	Exchange of emails with counsel for defendant Polce regarding the subpoena served upon the Bergen County Prosecutor's Office and receipt of documentation.	0.20	160.0000	32.00	Fee	U
6	04/01/2019	L204	SKS	Review the Joint Discovery Plan and transmit email to all counsel confirming acceptance and consent to file the discovery plan with the Court.	0.30	160.0000	48.00	Fee	U
7	04/02/2019	L208	SKS	Exchange of emails with plaintiffs counsel regarding the filing of the Joint Discovery Plan; electronically file the Joint Discovery Plan with the Court on behalf of all parties.	0.20	160.0000	32.00	Fee	U
8	04/02/2019	L204	SKS	Receipt and review of email from the Court transmitting the filed Joint Discovery Plan; email same to all counsel of record.	0.30	160.0000	48.00	Fee	U
9	04/04/2019	L214	SKS	Review the filed Amended Pre-Trial Scheduling from the Court.	0.20	160.0000	32.00	Fee	U

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4205

#	Date	Task	TK	Narrative	Units	Rate	Amount	Type	Charge Type
10	04/04/2019	L204	SKS	Receipt and review of email from the Court transmitting the Amended Pre-Trial Scheduling Order and scheduling a status conference on June 19, 2019, scheduling deadlines for filing motions to amend pleadings and add parties, and scheduling a discovery end date.	0.20	160.0000	32.00	Fee	U
11	04/09/2019	L324	SKS	Receipt and review of email from Mr. O'Connor transmitting the Borough's responses to the defendant councilpersons' written discovery demands, Rule 26 disclosures and the Borough's interrogatory answers; highlight portions of the responses and identify documents to be used during the deposition of plaintiff.	3.60	160.0000	576.00	Fee	U
12	04/09/2019	L313	SKS	Prepare and transmit email containing plaintiff's interrogatory answers and response to document requests, to the Borough Attorney and Labor Counsel for review.	0.30	160.0000	48.00	Fee	U
13	04/09/2019	L114	SKS	Receipt and review of email from Mr. Corrigan, the Boroughs Labor Counsel, transmitting a written status update regarding the pending tenure case against the plaintiff in the Office of Administrative Law (OAL).	0.40	160.0000	64.00	Fee	U
14	04/09/2019	L107	SKS	Exchange of emails with the Borough Attorney regarding a conference to discuss the litigation and pending tenure charges against the plaintiff.	0.10	160.0000	16.00	Fee	U
15	04/09/2019	L106	SKS	Prepare and transmit emails to clients forwarding the filed Amended Pre-Trial Scheduling Order and status regarding scheduling deadlines and discovery regarding plaintiffs additional claims in the Amended Complaint.	0.30	160.0000	48.00	Fee	U

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4205

#	Date	Task	K	Narrative	Units	Rate	Amount	Type	Charge Type
16	04/09/2019	L104	SKS	Exchange of emails with the Borough Attorney regarding the issuance of a subpoena to the Bergen County Prosecutors Office to obtain documentation of its investigation into plaintiffs work-related activities.	0.20	160.0000	32.00	Fee	U
17	04/09/2019	L114	SKS	Exchange of emails with the Borough Attorney and Labor Counsel regarding plaintiff's attempt to amend his pleadings to include his termination as part of the federal litigation.	0.20	160.0000	32.00	Fee	U
18	04/11/2019	L127	SKS	Exchange of emails with the Borough Attorney regarding plaintiff's responses to written discovery.	0.20	160.0000	32.00	Fee	U
19	04/11/2019	L127	SKS	Prepare and transmit email to the Borough Attorney identifying specific documents provided by plaintiff concerning complaints about alleged retaliation and confirmation of a telephone conference to discuss the case.	0.20	160.0000	32.00	Fee	U
20	04/12/2019	L127	SKS	Telephone conference with the Borough Attorney regarding plaintiff's cause of action, complaints of alleged retaliation, defendants' response to those complaints, defense strategy, the position of the plaintiff and other persons, and future proceedings.	1.50	160.0000	240.00	Fee	U
21	04/15/2019	L313	SKS	Prepare correspondence to plaintiff's counsel transmitting defendants' second set of interrogatories and document requests; email the written discovery demands to co-defense counsel and the Borough Attorney.	0.20	160.0000	32.00	Fee	U
22	04/15/2019	L313	SKS	Prepare defendants' Second Set of Interrogatories to plaintiff's counsel per the Court's Amended Scheduling Order.	3.20	160.0000	512.00	Fee	U
23	04/15/2019	L323	SKS	Prepare defendants' Second Request for Production to plaintiff's counsel per the Court's Amended Scheduling Order.	1.80	160.0000	288.00	Fee	U

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4205

#	Date	Task	TK	Narrative	Units	Rate	Amount Type	Charge Type
24	04/15/2019	L116	SKS	Telephone conference with Mr. Olkowski regarding the tenure case involving plaintiff, discussion of the plaintiff's claims, the applicable law and defense strategy.	0.60	160.0000	96.00 Fee	U
25	04/16/2019	L128	SKS	Second telephone conference with Mr. Oconner regarding plaintiff's claims in the Amended Complaint, and defense strategy	0.40	160.0000	64.00 Fee	U
26	04/16/2019	L316	SKS	Prepare email and transmit defendants' second set of interrogatories and document requests to the clients.	0.10	160.0000	16.00 Fee	U
27	04/16/2019	L128	SKS	Telephone conference with Mr. O'Connor regarding discovery propounded upon plaintiff, defense strategy and plaintiff's deposition.	0.50	160.0000	80.00 Fee	U
28	04/17/2019	L318	SKS	Exchange of emails with plaintiff's counsel regarding defendants' second set of written discovery demands, and plaintiff's intention to serve supplemental discovery demands on the clients.	0.20	160.0000	32.00 Fee	U
29	04/17/2019	L114	SKS	Receipt and review of email from the Borough Attorney to the Bergen County Prosecutor's Office regarding compliance with the subpoena seeking investigative documents concerning plaintiff.	0.10	160.0000	16.00 Fee	U
30	04/17/2019	L324	SKS	Receipt and review of email from Mr. McGuire at the Bergen County Prosecutor's Office regarding production of the investigative file in response to the subpoena.	0.10	160.0000	16.00 Fee	U
31	04/24/2019	L114	SKS	Receipt and review of email from the Borough's Labor Counsel providing a status on the tenure case involving plaintiff venued in the AOL.	0.20	160.0000	32.00 Fee	U
32	04/26/2019	L116	SKS	Telephone conference with Mr. Olkowski regarding events transpiring within the Borough, and case status.	0.40	160.0000	64.00 Fee	U

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4205

#	Date	Task	TK	Narrative	Units	Rate	Amount	Type	Charge Type
33	04/29/2019	L126	SKS	Telephone conference with Ms. Bustamante regarding the potential for mediation, the Borough's position regarding settlement and case status.	0.30	160.0000	48.00	Fee	U
34	05/03/2019	L114	SKS	Receipt and review of email from the Borough Attorney transmitting investigative documents produced by the Bergen County Prosecutor's Office in response to the issuance of a subpoena concerning plaintiff's activities in the Borough; identify certain documents to be used at plaintiff's deposition.	3.20	160.0000	512.00	Fee	U
35	05/03/2019	L117	SKS	Exchange of emails with the Borough Attorney regarding a response from the Bergen County Prosecutor's Office about production of the investigative file involving plaintiff.	0.20	160.0000	32.00	Fee	U
36	05/06/2019	L126	SKS	Telephone conference with Ms. Bustamante regarding mediation, communications with plaintiff's counsel concerning settlement, discovery and future proceedings.	0.50	160.0000	80.00	Fee	U
37	05/14/2019	L116	SKS	Telephone conference with Mr. Andrews regarding the status of the case, defense strategy and events transpiring within the Borough involving the plaintiff.	0.30	160.0000	48.00	Fee	U
38	05/16/2019	L116	SKS	Telephone conference with Mr. Olkowski regarding plaintiff's claims in the Amended Complaint, defense strategy and events transpiring within the Borough.	0.50	160.0000	80.00	Fee	U
39	05/17/2019	L168	SKS	Telephone conference with the Borough Attorney regarding mediation and settlement, case status and subpoena issued to the Bergen County Prosecutor's Office.	0.40	160.0000	64.00	Fee	U
40	05/29/2019	L194	SKS	Receipt and review of email from the Court confirming reassignment of the case from Judge Linares to Judge Checci.	0.10	160.0000	16.00	Fee	U

Deduction: Communications \ Reasonableness of Time

-0.05

-8.00

This appears to be a brief task or communication. Appeals unaccompanied by relevant

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4205

#	Date	Task	TK	Narrative	Units	Rate	Amount	Type	Charge Type
communication in question may not be considered.									
41	05/31/2019	L116	SKS	Telephone conference with Mr. Androwls regarding discovery, plaintiff's deposition and events transpiring within the Borough.	0.30	160.0000	48.00	Fee	U
42	06/03/2019	L167	SKS	Receipt and review of email from plaintiff's counsel regarding mediation.	0.10	160.0000	16.00	Fee	U
43	06/03/2019	L168	SKS	Prepare and transmit email to plaintiff's counsel regarding mediation and request for plaintiff's overdue responses to defendants' second set of interrogatories and document requests.	0.10	160.0000	16.00	Fee	U
44	06/04/2019	L168	SKS	Exchange of emails with the Borough Attorney confirming the Borough's position regarding mediation and settlement.	0.20	160.0000	32.00	Fee	U
45	06/04/2019	L317	SKS	Exchange of emails with the Borough Attorney regarding plaintiff's counsel's inquiry concerning mediation and overdue discovery from the plaintiff.	0.20	160.0000	32.00	Fee	U
46	06/10/2019	L333	SKS	Prepare notice to take deposition of plaintiff; email deposition notice to all counsel.	0.20	160.0000	32.00	Fee	U
Deduction: Paralegal (attorneys billing)						0.00	-85.0000	-17.00	
Task is paralegal skill level work. Rate reduced to firm approved paralegal rate.									
47	06/10/2019	L128	SKS	Telephone conference with Mr. O'Connor regarding the upcoming status conference, discovery and plaintiff's deposition, and defense strategy.	0.60	160.0000	96.00	Fee	U
48	06/11/2019	L318	SKS	Telephone conference with plaintiff's counsel regarding outstanding discovery, the upcoming status conference and depositions.	0.20	160.0000	32.00	Fee	U
49	06/14/2019	L318	SKS	Exchange of emails with the Borough Attorney confirming the Borough's position regarding mediation and settlement.	0.20	160.0000	32.00	Fee	U
50	06/17/2019	L318	SKS	Exchange of emails with plaintiff's counsel demanding answers to defendants' second set of interrogatories and document requests.	0.20	160.0000	32.00	Fee	U

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4205

#	Date	Task	TK	Narrative	Units	Rate	Amount Type	Charge Type
51	06/18/2019	L116	SKS	Telephone conference with Mr. Olkowski providing a case status, discovery from plaintiff, defense strategy and future proceedings.	0.50	160.0000	80.00 Fee	U
52	06/19/2019	L234	SKS	Receipt and review of email from the Court transmitting a docket entry for the telephone status conference and scheduling a status conference for September 17, 2019.	0.10	160.0000	16.00 Fee	U
Deduction: Communications \ Reasonableness of Time					-0.05		-8.00	
This appears to be a brief task or communication. Appeals unaccompanied by relevant communication in question may not be considered.								
53	06/19/2019	L239	SKS	Attend the telephonic case management conference with Judge Dickson and all counsel regarding the status of the case, discovery and scheduling of future proceedings.	0.40	160.0000	64.00 Fee	U
54	06/19/2019	L231	SKS	Review file documents regarding discovery and draft a brief outline of points to be discussed during the telephonic case management with the Court.	0.40	160.0000	64.00 Fee	U
55	06/19/2019	L168	SKS	Telephone conference with plaintiff's counsel to confirm the defendants' position regarding mediation and settlement, and issues to be discussed during the telephonic status conference with Judge Dickson.	0.60	160.0000	96.00 Fee	U
56	06/19/2019	L127	SKS	Telephone conference with Mr. O'Connor regarding the telephonic case management conference, deposition of the plaintiff, plaintiff's discovery responses and defense strategy.	0.70	160.0000	112.00 Fee	U
57	06/21/2019	L314	SKS	Receipt and partial review of plaintiff's answers to defendants' second set of interrogatories; review documentation attached as exhibits relating to the additional claims in the Amended Complaint; highlight and identify specific documents for plaintiff's deposition.	2.80	160.0000	448.00 Fee	U

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4205

#	Date	Task	TK	Narrative	Units	Rate	Amount	Type	Charge Type
58	06/24/2019	L314	SKS	Review plaintiff's response to defendants' second set of document requests and remainder of the documentation attached as exhibits relating to the additional claims set forth in the Amended Complaint; highlight and identify specific documents for plaintiff's deposition.	2.60	160.0000	416.00	Fee	U
59	06/27/2019	L338	SKS	Telephone conference with plaintiff's counsel regarding documentation produced by plaintiff in response to defendants' second set of discovery demands; plaintiff's deposition and depositions of the councilperson defendants.	0.40	160.0000	64.00	Fee	U

Print

Invoice Status

Vendor: Scott K. Seelagy, Esq.
 Invoice Number: 2019-6 [print]
 Client ID: 4430
 Invoice Date: 12/02/2019
 Receipt Date: 12/02/2019
 Release Status: RELEASED FOR PAYMENT
 Release Date: 12/10/2019
 Diary Date: 12/16/2019
 Start Date: 07/02/2019
 End Date: 09/28/2019
 Reviewer: Deborah McIntyre
 Case: Witold Baginski v. Borough of Wallington, et als [edit] [invoices] Spent: 12,762.00
 Claim: CM-0708
 Total Billed: 1,804.00
 Shared % (Fee): 100%
 Shared % (Expense): 100%
 Total Applied Deductions: \$7.00
 Total Adjustments: 0.00
 Approved: 1,847.00 ✓
 Appeals: 0 Appeal Expiration Date: 04/08/2020
 Appeal Responses: 0
 Payment Status: None
 Payment Date:
 Payment Type:
 Payment Number:
 Supporting Documentation:

(4MB limit)

Page: [First](#) [\(1\)](#) [Last](#)

Showing results 1 to 43 of 43

Set Results per Page: ☐ 25 ☐ 50 ☒ 100 ☐ 200

Date	Inv ID	Task	TK	Item Type	Narrative	Charge Type	Units	Rate	Amount
07/02/2019	26756571	L126	aks	Fee	Telephone conference with Councilman Olkowski regarding plaintiff's deposition, the allegations against the individual councilpersons and defense strategy.	U	0.40	160.00	64.00
07/02/2019	26756571	L126	aks	Fee	Telephone conference with Councilman Androwits regarding plaintiff's deposition, discovery and future proceedings.	U	0.30	160.00	48.00
07/03/2019	26756571	L338	aks	Fee	Prepare and transmit email to plaintiff's counsel regarding plaintiff's deposition.	U	0.10	160.00	16.00
07/05/2019	26756571	L338	aks	Fee	Exchange of emails with counsel for defendant Polce regarding plaintiff's deposition and request for a conference to discuss defense strategy.	U	0.20	160.00	32.00
07/08/2019	26756571	L338	aks	Fee	Exchange of emails with plaintiff's counsel regarding scheduling and completion of plaintiff's deposition.	U	0.20	160.00	32.00
07/08/2019	26756571	L128	aks	Fee	Telephone conference with counsel for defendant Polce regarding the allegations in the First Amended Complaint and defense strategy.	U	0.50	160.00	80.00
07/09/2019	26756571	L128	aks	Fee	Telephone conference with Mr. O'Connor regarding plaintiff's deposition, supplemental discovery documents supplied by plaintiff, discussion of the allegations in the First Amended Complaint and defense strategy.	U	0.40	160.00	64.00
07/09/2019	26756571	L126	aks	Fee	Telephone conference with Councilman Olkowski regarding the tenure charges pending against plaintiff and the relevance of the administrative action to the federal action.	U	0.40	160.00	64.00
07/12/2019	26756571	L128	aks	Fee	Telephone conference with Mr. O'Connor regarding issues to be addressed during plaintiff's deposition, defense strategy, the administrative tenure charge case and its relevance to the federal action and future proceedings.	U	1.40	160.00	224.00
07/12/2019	26756571	L126	aks	Fee	Telephone conference with Mr. Olkowski regarding events transpiring within the Borough, the tenure charges pending against plaintiff and strategy to defend him in the lawsuit.	U	0.40	160.00	64.00
07/12/2019	26756571	L338	aks	Fee	Telephone conference with plaintiff's counsel regarding plaintiff's deposition, production of the defendant councilpersons for depositions and discussion regarding plaintiff's supplemental discovery responses.	U	0.40	160.00	64.00

Date	Inv ID	Task	TK	Item Type	Narrative	Charge Type	Units	Rate	Amount
07/29/2019	26756571	L128	skg	Fee	Telephone conference with counsel for defendant Police regarding the deposition of plaintiff and discovery.	U	0.20	160.00	32.00
07/31/2019	26756571	L128	skg	Fee	Telephone conference with Mr. Olkowski regarding events transpiring within the Borough, the pending tenure charges against plaintiff and defense strategy.	U	0.40	160.00	64.00
08/06/2019	26756571	L338	skg	Fee	Prepare and transmit email to plaintiff's counsel regarding plaintiff's deposition.	U	0.10	160.00	16.00
08/12/2019	26756571	L128	skg	Fee	Telephone conference with Mr. Androws regarding events transpiring within the Borough, the pending tenure charges against plaintiff and defense strategy.	U	0.30	160.00	48.00
08/13/2019	26756571	L338	skg	Fee	Prepare and transmit follow-up email to plaintiff's counsel regarding plaintiff's deposition.	U	0.10	160.00	16.00
08/14/2019	26756571	L338	skg	Fee	Telephone conference with plaintiff's counsel regarding plaintiff's deposition, potential for mediation and depositions of the councilperson defendants; discovery end date per the Joint Discovery Plan.	U	0.30	160.00	48.00
08/28/2019	26756571	L118	skg	Fee	Telephone conference with plaintiff's counsel regarding prior settlement conferences and offers of settlement; the pending tenure charge case against the plaintiff.	U	0.30	160.00	48.00
08/28/2019	26756571	L128	skg	Fee	Receipt and review of email from Mr. Corrigan, the Borough's Labor Attorney, transmitting an email enclosing correspondence to Judge Scollio at the OAL regarding the administrative tenure case; review separate correspondence regarding the federal action and the interplay with the tenure matter.	U	0.40	160.00	64.00
08/30/2019	26756571	L168	skg	Fee	Prepare and transmit email to Mr. Malagiere and co-defense counsel regarding prior settlement offers extended to the plaintiff, which plaintiff rejected.	U	0.10	160.00	16.00
08/30/2019	26756571	L168	skg	Fee	Prepare and transmit email to Mr. Malagiere and co-defense counsel confirming no pending offers of settlement and the Borough's position concerning settlement; and plaintiff's deposition.	U	0.10	160.00	16.00
08/30/2019	26756571	L114	skg	Fee	Receipt and review of email from Mr. Corrigan transmitting a status concerning the tenure charge case against plaintiff.	U	0.30	160.00	48.00
08/30/2019	26756571	L164	skg	Fee	Receipt and review of email from Mr. Malagiere inquiring about prior settlement offers extended to the plaintiff.	U	0.10	160.00	16.00
					Communications/Reasonableness of Time - This appears to be a brief task or communication. Appeals unaccompanied by relevant communication in question may not be considered.				-8.00
08/30/2019	26756571	L168	skg	Fee	Exchange of additional emails with Mr. Malagiere and co-defense counsel regarding the prior settlement offer extended to plaintiff.	U	0.20	160.00	32.00
08/30/2019	26756571	L164	skg	Fee	Receipt and review of email from Mr. Malagiere regarding prior settlement offers to the plaintiff and the Borough's position regarding settlement.	U	0.10	160.00	16.00
08/30/2019	26756571	L164	skg	Fee	Receipt and review of two emails from Mr. O'Connor regarding prior settlement offers extended to the plaintiff.	U	0.20	160.00	32.00
09/02/2019	26756571	L118	skg	Fee	Telephone conference with the Borough Administrator regarding the lawsuit, discovery and the pending tenure charges against the plaintiff.	U	0.40	160.00	64.00
08/11/2019	26756571	L338	skg	Fee	Exchange of additional emails with plaintiff's counsel regarding plaintiff's deposition and completion of discovery.	U	0.20	160.00	32.00
08/12/2019	26756571	L308	skg	Fee	Exchange of additional emails with all counsel regarding plaintiff's deposition and discovery.	U	0.20	160.00	32.00
09/12/2019	26756571	L333	skg	Fee	Prepare Notice to Take Deposition of plaintiff; email deposition notice to all counsel.	U	0.20	160.00	32.00
					Paralegal (attorneys billing) - Task is paralegal skill level work. Rate reduced to firm approved paralegal rate.				-85.0000 -17.00
09/17/2019	26756571	L333	skg	Fee	Prepare and transmit email to all clients regarding depositions and the submission of a joint status letter to the Court concerning discovery.	U	0.10	160.00	16.00
09/17/2019	26756571	L238	skg	Fee	Exchange of emails with plaintiff's counsel and co-defense counsel regarding the scheduled status conference with the Court and submission of a joint status letter regarding discovery.	U	0.20	160.00	32.00
09/17/2019	26756571	L334	skg	Fee	Receipt and review of email from Mr. O'Connor to plaintiff's counsel regarding depositions of Borough employees.	U	0.10	160.00	16.00
09/17/2019	26756571	L234	skg	Fee	Receipt and review of email from the Court transmitting a text order requiring the parties to submit a joint status report concerning discovery.	U	0.20	160.00	32.00
					Communications/Reasonableness of Time - This appears to be a brief task or communication. Appeals unaccompanied by relevant communication in question may not be considered.				-16.00
09/17/2019	26756571	L128	skg	Fee	Telephone conference with Councilman Androws regarding events transpiring within the Borough, depositions of the plaintiff and discussion of the case.	U	0.20	160.00	32.00
09/18/2019	26756571	L128	skg	Fee	Telephone conference with Councilman Olkowski regarding events transpiring within the Borough, his tenure as an elected official and potential impact on the case.	U	0.30	160.00	48.00
09/19/2019	26756571	L194	skg	Fee	Receipt and review of email from plaintiff's counsel transmitting a draft status letter to the Court for review; email to plaintiff's counsel confirming acceptance of the status letter.	U	0.20	160.00	32.00
09/19/2019	26756571	L338	skg	Fee	Exchange of emails with plaintiff's counsel regarding a conference call to discuss depositions and submission of the joint status letter to the Court.	U	0.20	160.00	32.00
09/20/2019	26756571	L338	skg	Fee	Telephone conference with plaintiff's counsel regarding submission of the joint status letter to the Court and depositions.	U	0.30	160.00	48.00
09/20/2019									

Date	Inv ID	Task	TK	Item Type	Narrative	Charge Type	Units	Rate	Amount
	26756571	L114	skg	Fee	Receipt and review of email from the Court transmitting the filed joint status letter regarding discovery and future proceedings.	U	0.20	160.00	32.00
09/23/2019	26756571	L126	skg	Fee	Prepare and transmit email containing a case status to Ms. Bustamante.	U	0.30	160.00	48.00
09/23/2019	26756571	L394	skg	Fee	Receipt and review of email from the Court transmitting a text order scheduling discovery and a settlement conference on January 10, 2020; submission of confidential settlement position papers.	U	0.20	160.00	32.00
					Communications/Reasonableness of Time - This appears to be a brief task or communication. Appeals unaccompanied by relevant communication in question may not be considered.				-16.00
09/26/2019	26756571	L126	skg	Fee	Telephone conference with Councilman Olkowsk regarding his tenure on the Borough Council, his deposition and future proceedings.	U	0.50	160.00	80.00

Page: [First](#) [\(1\)](#) [Last](#)

Showing results 1 to 43 of 43

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Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

June 6, 2019

Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Att: Hector Olmo

Re: Insured: Borough of Wallington
Claimant: Fehl, Joseph
Policy No: QJP0102602
Claim No.: QM-1030

Dear Mr. Olmo,

Summit Risk Services is the Third Party Administrator on behalf of the QBE Specialty Insurance Company.

Enclosed please find for payment, QBE Specialty Insurance Company's invoice relative to the Insured's retention and coinsurance obligations to date.

Unless we hear back from you to the contrary, we will assume that the attached invoice will be paid by the Insured within 30 days.

Please be reminded that you can contact your JIF Claims Coordinator for details relative to a deferred deductible and copayment plan which has been adopted by your local JIF.

Please feel free to contact the assigned adjuster Ryan Thomas, at 215-443-3517 or thomas@summitrisk.com, should you have any questions.

We appreciate your prompt attention to this matter.

Sincerely,
Summit Risk Services,
Alice Ivers for Ryan Thomas

cc: Paul Barbire
South Bergen JIF Fund Attorney

Retention and Coinsurance Invoice (3)

Payment Due Date: 7/6/19

TO: Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Invoice Date:	6/6/19
Claim Number:	QM-1030
Claimant:	Fehl, Joseph
Policy #:	QJP0102602

Policy Retention/Coinsurance Amount	Invoice Amount Paid	Retention Reimbursement Payment <u>Due From Borough of Wallington</u>
\$10,000.00/\$20,000.00	\$593.00 \$383.13 \$562.41	<u>\$1,538.54</u>

Please make check payable to: QBE Specialty Insurance Company

Send Payment To: Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Att: Ryan Thomas

PLEASE INCLUDE THE CLAIM NUMBER ON ALL REMITTANCES TO ENSURE PROPER CREDIT

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

September 04, 2018

Invoice No. 1228

Summit Risk Services
Ryan Thomas
120 Gibraltar Road, Suite 210
CC: JOHN MARKEL
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 Feh1 v. Borough of Wallington, et al.
Claim Number: QM-1030
File Number: 024-4788

Summit Risk sharing cost (25%) with SBJIF (75%)
For Services Rendered Through 8/31/2018.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
8/6/2018	MM	review file, status of outstanding discovery	0.20	\$32.00
8/6/2018	MM	draft email to company re: new counsel	0.20	\$32.00
8/6/2018	MM	draft letter to plaintiff re: overdue discovery	0.20	\$32.00
8/6/2018	MM	telephone conference with company re: new counsel	0.10	\$16.00
8/6/2018	MM	draft email to company re: new counsel	0.10	\$16.00
8/7/2018	EC	Draft ltr to Plaintiff re: outstanding discovery	0.20	\$15.00
8/7/2018	MM	review correspondence from plaintiff re: automatic extension to motion to dismiss	0.10	\$16.00
8/8/2018	MM	review correspondence from company re: check	0.10	\$16.00
8/10/2018	MM	telephone conference with company re: new counsel assigned for Baginski	0.10	\$16.00
8/17/2018	MM	review correspondence from codefendant re: substitution of attorney	0.10	\$16.00
8/17/2018	MM	draft correspondence to codefendant re: substitution of attorney	0.10	\$16.00
8/20/2018	MM	review correspondence from Court re: filed substitution of attorney	0.10	\$16.00

Continued On Next Page

8/21/2018	MM	review correspondence from plaintiff re: conference call information	0.10	\$16.00
8/21/2018	MM	draft correspondence to codefendant re: conference call information	0.10	\$16.00
8/21/2018	MM	review correspondence from codefendant re: conference call information	0.10	\$16.00
8/22/2018	MM	telephone conference with codefendant re: conference call and status of litigation	0.20	\$32.00
8/22/2018	MM	draft email to codefendant re: previous scheduling order and related documents	0.20	\$32.00
8/22/2018	MM	preparation for conference with Court	0.40	\$64.00
8/22/2018	MM	review correspondence from Court re: text order phone conference	0.10	\$16.00
8/29/2018	JB	Review file re: status of outstanding discovery from our clients	0.10	\$14.00
8/29/2018	JB	Telephone conference with client (Kudlacik) re: Plaintiff's discovery demands.	0.10	\$14.00
8/29/2018	JB	Review and revise client (Kudlacik) answers to interrogatories.	0.10	\$14.00
8/29/2018	MM	telephone conference with Borough Attorney re: certification of Borough rogs	0.20	\$32.00
8/29/2018	MM	telephone conference with Borough Administrator re: certification of interrogatories	0.20	\$32.00
8/29/2018	JB	Telephone conference with Attorney General's office re: subpoena	0.10	\$14.00
8/29/2018	JB	Email correspondence to client (Kudlacik) enclosing draft answers to interrogatories for review and signing.	0.10	\$14.00
8/29/2018	JB	Extended telephone conference with co-defendant's (BCPO) counsel re: our subpoena	0.20	\$28.00

Billable Hours / Fees: 3.90 \$593.00

Timekeeper Summary

Timekeeper MM worked 3.00 hours at \$160.00 per hour, totaling \$480.00.

Timekeeper JB worked 0.70 hours at \$140.00 per hour, totaling \$98.00.

Timekeeper EC worked 0.20 hours at \$75.00 per hour, totaling \$15.00.

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

9/4/2018
Page: 3

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
8/3/2018	Check Number - 4449 against Inv# 938	(\$304.00)
8/3/2018	Check Number - 4445 against Inv# 1010	(\$587.25)
8/3/2018	Check Number - 4445 against Inv# 1010	(\$11.36)
8/3/2018	Check Number - 4449 against Inv# 1084	(\$153.00)
8/9/2018	Check Number - 56539 against Inv# 1169	(\$962.27)
8/9/2018	Check Number - 56539 against Inv# 1169	(\$119.98)
8/27/2018	Check Number - 4672 against Inv# 1169	(\$360.73)
Total Payments Received:		(\$2,498.59)

Current Invoice Summary

Prior Balance:	\$2,498.59	
Payments Received:	(\$2,498.59)	Last Payment: 8/27/2018
Unpaid Prior Balance:	\$0.00	
Current Fees:	\$593.00	
Advanced Costs:	\$0.00	
TOTAL AMOUNT DUE:	\$593.00	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041

Tax ID # 27-3179634

April 02, 2019

Invoice No. 1806

Summit Risk Services
Ryan Thomas
120 Gibraltar Road, Suite 210
CC: JOHN MARKEL
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 Febl v. Borough of Wallington, et al.

Claim Number: QM-1030

File Number: 024-4788

For Services Rendered Through 3/31/2019.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
3/1/2019	MM	prepare correspondence to all parties re: plaintiff's deposition adjourned	0.20	\$32.00
3/1/2019	JB	Telephone conference with Harrington Park Borough Attorney re: prior litigation involving Plaintiff.	0.10	\$14.00
3/1/2019	JB	Second telephone conference with Harrington Park Borough Attorney re: prior litigation involving Plaintiff.	0.10	\$14.00
3/1/2019	JB	telephone conference with Co-defendant (BCPO) re: discovery and scheduled depositions.	0.20	\$28.00
3/12/2019	MM	review correspondence from plaintiff re: supplemental discovery demands	0.10	\$16.00
3/12/2019	JB	Review Plaintiff's supplemental discovery demands.	0.10	\$14.00
3/12/2019	JB	Review file re: status of outstanding discovery items sought by Plaintiff.	0.20	\$28.00
3/12/2019	JB	Telephone conference with Client (Borough) re: outstanding fire department minutes to be produced.	0.10	\$14.00
3/12/2019	MM	draft email to company re: policy information	0.10	\$16.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

4/2/2019
Page: 2

3/12/2019	JB	Legal research re: state law privilege in context of federal law allegations.	0.60	\$84.00
3/12/2019	JB	Prepare analysis/memo of state law privilege in context of federal law allegations.	0.40	\$56.00
3/12/2019	JB	Prepare email to Client (Borough) re: outstanding fire department minutes to be produced.	0.10	\$14.00
3/12/2019	JB	Review additional documents/news articles produced by Plaintiff.	0.30	\$42.00
3/12/2019	JB	Revise/update index of Plaintiff's document production.	0.10	\$14.00
3/14/2019	JB	Review file re: outstanding discovery from co-defendant BCPO.	0.10	\$14.00
3/14/2019	JB	Prepare written correspondence to Co-defendant BCPO re: outstanding document production.	0.20	\$28.00
3/14/2019	JB	Prepare email to Co-defendant BCPO re: outstanding document production.	0.10	\$14.00
3/15/2019	JB	Receipt and review email from Co-defendant BCPO re: overdue document production.	0.10	\$14.00
3/15/2019	JB	Prepare email to Co-defendant BCPO re: overdue document production.	0.10	\$14.00
3/15/2019	MM	review deposition transcript of Sharon McCaffrey (subpoenaed witness from Bergen Risk)	0.40	\$64.00
3/15/2019	JB	email to new Borough Administrator for Wallington re: our representation of Borough and outstanding discovery.	0.20	\$28.00
3/18/2019	JB	Begin drafting response to Plaintiff's demand for more specific answers to discovery.	0.20	\$28.00
3/18/2019	JB	Draft objection, with supporting case law, to Plaintiff's second demand for Defendant Kudlacik's personnel records.	0.60	\$84.00
3/20/2019	JB	telephone conference with Client (Borough) re: our outstanding discovery.	0.20	\$28.00
3/21/2019	JB	Receipt and review written correspondence from Co-defendant BCPO re: discovery.	0.10	\$14.00
3/21/2019	JB	Review audio files provided by Co-defendant BCPO utilized in its investigation of Plaintiff.	0.30	\$42.00
3/21/2019	JB	Review Park Row video files provided by Co-defendant BCPO utilized in its investigation of Plaintiff.	0.50	\$70.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

4/2/2019
Page: 3

3/21/2019	JB	Review video provided by Co-defendant BCPO of Client Kudlacik interviewing Plaintiff's squadmember, Doug Krause.	0.40	\$56.00
3/21/2019	JB	Review video provided by Co-defendant BCPO of Client Kudlacik interviewing Plaintiff's squadmember, Michael Chermack.	0.20	\$28.00
3/21/2019	JB	Review video provided by Co-defendant BCPO of Client Kudlacik interviewing Plaintiff.	0.40	\$56.00
3/21/2019	JB	Prepare analysis/memo of investigation files provided by Co-defendant BCPO.	0.60	\$84.00
3/21/2019	JB	Prepare written correspondence to Plaintiff amending our answers to interrogatories to include investigation materials provided by Co-defendant BCPO.	0.20	\$28.00
3/21/2019	JB	Prepare summary to Company re: investigation materials provided by Co-defendant BCPO.	0.20	\$28.00
3/22/2019	JB	Telephone conference with Client (Borough) re: discovery.	0.10	\$14.00
3/27/2019	MM	review correspondence from codefendant re: rog amendment	0.10	\$16.00
3/27/2019	MM	draft email to all counsel re: prosecutor's file and transcript	0.20	\$32.00
3/27/2019	EC	Page line summary of Sharon McCaffrey pages 1-75	1.30	\$97.50
3/27/2019	JB	Review email correspondence from Co-defendant BCPO re: outstanding discovery.	0.10	\$14.00
3/27/2019	JB	Review all discovery materials provided by Co-defendant BCPO to date.	0.20	\$28.00
3/27/2019	JB	Prepare email correspondence to Co-defendant BCPO re: outstanding discovery.	0.10	\$14.00
3/27/2019	JB	Review second email correspondence from Co-defendant BCPO re: outstanding discovery.	0.10	\$14.00
3/27/2019	JB	Prepare second email correspondence to Co-defendant BCPO re: outstanding discovery.	0.10	\$14.00
3/27/2019	JB	Review email correspondence from Plaintiff re: outstanding discovery from Co-defendant BCPO.	0.10	\$14.00
3/27/2019	MM	review correspondence from codefendant BCPO re: file	0.10	\$16.00
3/27/2019	MM	draft email to BCPO re: records	0.10	\$16.00
3/27/2019	MM	draft email to codefendant Baginski re: BCPO file	0.10	\$16.00
3/27/2019	MM	review correspondence from codefendant Baginski re: BCPO	0.10	\$16.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

4/2/2019
Page: 4

3/27/2019	MM	review second correspondence from BCPO re: records	0.10	\$16.00
3/29/2019	EC	Update and revise deposition transcripts binder	0.20	\$15.00
3/29/2019	JB	Prepare email to Client (Borough) re: fire department meeting minutes.	0.10	\$14.00
3/29/2019	MM	review correspondence from plaintiff re: discovery	0.10	\$16.00
3/29/2019	JB	Review email correspondence from Plaintiff re: outstanding discovery from Co-defendant BCPO.	0.10	\$14.00
3/29/2019	JB	Review email correspondence from Co-defendant BCPO re: outstanding discovery.	0.10	\$14.00
3/29/2019	JB	Prepare email correspondence to Co-defendant BCPO re: outstanding discovery.	0.10	\$14.00

Billable Hours / Fees: 11.40 \$1,532.50

Timekeeper Summary

Timekeeper JB worked 8.20 hours at \$140.00 per hour, totaling \$1,148.00.

Timekeeper MM worked 1.70 hours at \$160.00 per hour, totaling \$272.00.

Timekeeper EC worked 1.50 hours at \$75.00 per hour, totaling \$112.50.

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
3/4/2019	Check Number - 5882 against Inv# 1437	(\$504.24)
3/4/2019	Check Number - 5882 against Inv# 1534	(\$28.00)
3/4/2019	Check Number - 5882 against Inv# 1637	(\$318.00)
3/21/2019	Check Number - 6124 against Inv# 1727	(\$79.24)
3/21/2019	Check Number - 6124 against Inv# 1727	(\$40.44)
3/21/2019	Check Number - 6124 against Inv# 1727	(\$61.20)
3/25/2019	Check Number - 6223-6225 against Inv# 1727	(\$346.00)
Total Payments Received:		(\$1,377.12)

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

4/2/2019
Page: 5

Current Invoice Summary

Prior Balance:	\$3,099.88	
Payments Received:	(\$1,377.12)	Last Payment: 3/25/2019
Unpaid Prior Balance:	\$1,722.76	
Current Fees:	\$1,532.50	
Advanced Costs:	\$0.00	
TOTAL AMOUNT DUE:	\$3,255.26	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

March 04, 2019

Invoice No. 1727

Summit Risk Services
Ryan Thomas
120 Gibraltar Road, Suite 210
CC: JOHN MARKEL
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 Feh1 v. Borough of Wallington, et al.

Claim Number: QM-1030

File Number: 024-4788

For Services Rendered Through 2/28/2019.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
2/1/2019	JB	Receipt and review email correspondence from Client (Borough) re: additional discovery information.	0.10	\$14.00
2/1/2019	JB	Email correspondence to Client (Borough) re: additional discovery information.	0.10	\$14.00
2/1/2019	JB	Prepare list of state and federal cases involving Defendant (Borough) in last three (3) years for use in answers to interrogatories on behalf of Client (Borough).	0.30	\$42.00
2/1/2019	JB	Revise/edit answers to interrogatories on behalf of Client (Borough)	0.20	\$28.00
2/4/2019	DP	Receipt and review text order from Court re: discovery fact end date	0.10	\$16.00
2/5/2019	MM	review correspondence from plaintiff re: subpoena on BCPO	0.10	\$16.00
2/5/2019	MM	review correspondence from plaintiff re: subpoena on Bergen Risk	0.10	\$16.00
2/5/2019	MM	draft correspondence to plaintiff re: deposition	0.20	\$32.00
2/5/2019	MM	review/revise discovery responses and documents to produce	0.90	\$144.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

3/4/2019
Page: 2

2/5/2019	JB	Revise and finalize responses to Plaintiff's written document production in final form.	0.50	\$70.00
2/5/2019	JB	Bates stamp and prepare Borough document production	0.40	\$56.00
2/5/2019	JB	Prepare index of Borough document production.	0.30	\$42.00
2/11/2019	JB	Receipt/review email correspondence from Client (Borough) re: discovery.	0.10	\$14.00
2/11/2019	JB	Email correspondence to Client (Borough) re: discovery.	0.10	\$14.00
2/11/2019	JB	Receipt and review email correspondence from Client (Borough) re: signed discovery responses.	0.10	\$14.00
2/11/2019	JB	Prepare email correspondence to Client (Borough) re: signed discovery responses.	0.10	\$14.00
2/15/2019	MM	review correspondence from company re: conference	0.10	\$16.00
2/15/2019	MM	review correspondence from plaintiff re: counsel for Bergen Risk/Subpoenaed dep	0.10	\$16.00
2/15/2019	MM	meeting with Chris Botta re: future handling and discovery	0.30	\$48.00
2/15/2019	JB	Receipt and review written correspondence from Client (Borough) re: discovery responses and signed certification.	0.10	\$14.00
2/15/2019	JB	Review certification provided by Client (Borough).	0.10	\$14.00
2/15/2019	JB	finalize discovery responses on behalf of Client (Borough)	0.40	\$56.00
2/15/2019	JB	Prepare email correspondence to all parties re: Client's (Borough) discovery responses	0.30	\$42.00
2/15/2019	JB	Prepare email correspondence to Co-defendant (Baginski) re: Borough document production.	0.10	\$14.00
2/15/2019	JB	Receipt and review email correspondence from Co-defendant (Baginski) re: Borough document production.	0.10	\$14.00
2/15/2019	JB	Prepare email correspondence to co-defendant (BCPO) re: their document production.	0.10	\$14.00
2/19/2019	MM	review correspondence from client re: closure of account	0.10	\$16.00
2/21/2019	MM	review correspondence from plaintiff re: deposition	0.10	\$16.00
2/21/2019	MM	draft correspondence to plaintiff re: deposition	0.10	\$16.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

3/4/2019
Page: 3

2/21/2019	JB	Receipt and review email correspondence from Plaintiff re: upcoming deposition.	0.10	\$14.00
2/21/2019	JB	Receipt and review email correspondence from Co-defendant re: upcoming deposition.	0.10	\$14.00
2/21/2019	MM	review correspondence from codefendant re: deposition	0.10	\$16.00
2/24/2019	MM	Preparation for subpoenaed dep of Sharon McCaffrey (Bergen Risk)	1.20	\$192.00
2/25/2019	MM	attendance at deposition of Sharon McCaffrey (Bergen Risk) pursuant to subpoena	3.20	\$512.00
2/25/2019	JB	Receipt and review email correspondence from Co-defendant (BCPO) re: deposition and discovery	0.10	\$14.00
2/25/2019	JB	Prepare email correspondence to Co-defendant (BCPO) re: deposition and discovery	0.10	\$14.00
2/26/2019	JB	Receipt and review email correspondence from Co-defendant (BCPO) re: outstanding discovery documents.	0.10	\$14.00
2/26/2019	JB	Prepare email correspondence to Co-defendant (BCPO) re: outstanding discovery documents.	0.10	\$14.00
2/26/2019	JB	Legal research re: prior litigation initiated by Plaintiff.	0.40	\$56.00
2/26/2019	JB	Bates stamp and index document production from Client (Kudlacik).	0.50	\$70.00
2/26/2019	JB	Prepare written correspondence to Plaintiff enclosing Bates Stamped document production from Client (Kudlacik).	0.20	\$28.00
2/27/2019	MM	review correspondence from codefendant re: discovery	0.10	\$16.00
2/27/2019	JB	Index/bates stamp deposition exhibits (McCaffrey).	0.30	\$42.00
2/27/2019	JB	Prepare deposition transcript/exhibit binders.	0.50	\$70.00
2/27/2019	JB	Receipt and review email correspondence from Co-defendant (Baginski) re: discovery.	0.10	\$14.00
2/27/2019	JB	Revise/update evaluation and memo re: chronology of events based on new information from deposition (McCaffrey) exhibits.	0.40	\$56.00
2/28/2019	JB	Telephone conference with Borough Administrator/Clerk of Harrington Park re: discovery.	0.10	\$14.00
2/28/2019	JB	Second telephone conference with Borough Administrator/Clerk of Harrington Park re: discovery.	0.10	\$14.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

3/4/2019
Page: 4

2/28/2019	JB	Telephone conference with Borough Attorney for Harrington Park re: discovery.	0.10	\$14.00
2/28/2019	MM	telephone conference with codefendant re: deposition	0.20	\$32.00
2/28/2019	MM	telephone conference with plaintiff re: deposition/settlement	0.30	\$48.00
2/28/2019	JB	Revise/update evaluation and memo re: persons of interest based on new information from deposition (McCaffrey) exhibits.	0.20	\$28.00

Billable Hours / Fees: 14.30 \$2,148.00

Timekeeper Summary

Timekeeper MM worked 7.20 hours at \$160.00 per hour, totaling \$1,152.00.

Timekeeper JB worked 7.00 hours at \$140.00 per hour, totaling \$980.00.

Timekeeper DP worked 0.10 hours at \$160.00 per hour, totaling \$16.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
2/20/2019	Photocopies - discovery responses to all parties	\$50.40	
2/20/2019	Courier Charges - J Rindosh, Esq.	\$6.74	
2/20/2019	Courier Charges - C Botta, Esq.	\$6.74	
2/20/2019	Courier Charges - B Haroldson, Esq.	\$6.74	
2/27/2019	Courier Charges - J Rindosh, Esq.	\$6.74	
2/27/2019	Courier Charges - B. Haroldson, Esq.	\$6.74	
2/27/2019	Courier Charges - C Botta, Esq.	\$6.74	
2/27/2019	Photocopies - serve Bates Stamped discovery to all parties	\$10.80	
Total Costs		\$101.64	

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
2/19/2019	Check Number - 57911 against Inv# 1637	(\$954.00)
Total Payments Received:		(\$954.00)

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

3/4/2019
Page: 5

Current Invoice Summary

Prior Balance:	\$1,804.24	
Payments Received:	(\$954.00)	Last Payment: 2/19/2019
Unpaid Prior Balance:	<u>\$850.24</u>	
Current Fees:	\$2,148.00	
Advanced Costs:	<u>\$101.64</u>	
TOTAL AMOUNT DUE:	<u><u>\$3,099.88</u></u>	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.



Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

March 21, 2019

Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Att: Jane Fontana

Re: Insured: Borough of Wallington
Claimant: Fehl, Joseph
Policy No: QJP0102602
Claim No.: QM-1030

Dear Ms. Fontana,

Summit Risk Services is the Third Party Administrator on behalf of the QBE Specialty Insurance Company.

Enclosed please find for payment, QBE Specialty Insurance Company's invoice relative to the Insured's retention and coinsurance obligations to date.

Unless we hear back from you to the contrary, we will assume that the attached invoice will be paid by the Insured within 30 days.

Please be reminded that you can contact your JIF Claims Coordinator for details relative to a deferred deductible and copayment plan which has been adopted by your local JIF.

Please feel free to contact the assigned adjuster Ryan Thomas, at 215-443-3517 or thomas@summitrisk.com, should you have any questions.

We appreciate your prompt attention to this matter.

Sincerely,
Summit Risk Services,
Alice Ivers for Ryan Thomas

cc: Paul Barbire
South Bergen JIF Fund Attorney

Retention and Coinsurance Invoice (2)

Payment Due Date: 4/21/19

TO: Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Invoice Date:	3/21/19
Claim Number:	QM-1030
Claimant:	Fehl, Joseph
Policy #:	QJP0102602

Policy Retention/Coinsurance Amount	Invoice Amount Paid	Retention Reimbursement Payment <u>Due From Borough of Wallington</u>
\$10,000.00/\$20,000.00	\$1,293.50 \$ 180.88 \$ 28.00 \$ 318.00 \$ 88.00 \$1,600.00	<u>\$3,508.38</u>

Please make check payable to: QBE Specialty Insurance Company

Send Payment To: Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Att: Ryan Thomas

PLEASE INCLUDE THE CLAIM NUMBER ON ALL REMITTANCES TO ENSURE PROPER CREDIT

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

November 05, 2018

Invoice No. 1369

Summit Risk Services
Ryan Thomas
120 Gibraltar Road, Suite 210
CC: JOHN MARKEL
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 Feh1 v. Borough of Wallington, et al.

Claim Number: QM-1030

File Number: 024-4788

Summit Risk sharing cost (25%) with SBJIF (75%)
For Services Rendered Through 10/31/2018.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/2/2018	JB	Prepare written correspondence to client (Borough) re: outstanding discovery demands.	0.20	\$28.00
10/9/2018	MM	review correspondence from plaintiff re: depositions	0.10	\$16.00
10/10/2018	MM	Draft follow up ltr to Plaintiff re: outstanding discovery	0.20	\$32.00
10/10/2018	MM	Review file re: plaintiff's discovery	0.20	\$32.00
10/10/2018	MM	review correspondence from plaintiff re: dep notices	0.10	\$16.00
10/10/2018	MM	draft email to client re: deposition	0.20	\$32.00
10/10/2018	MM	draft letter to plaintiff re: dep notices and substitution of attorney for Baginski	0.30	\$48.00
10/10/2018	MM	Telephone conference with client re: deposition	0.20	\$32.00
10/10/2018	JB	Draft and prepare second 90 day litigation report.	1.20	\$168.00
10/17/2018	MM	review correspondence from company re: mediation	0.10	\$16.00
10/17/2018	MM	draft correspondence to company re: mediation	0.10	\$16.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

11/5/2018
Page: 2

10/23/2018	JB	Extended telephone conference with Plaintiff's counsel re: discovery.	0.20	\$28.00
10/23/2018	JB	Receipt and review email correspondence from Plaintiff's counsel re: discovery.	0.10	\$14.00
10/23/2018	JB	Prepare written correspondence to counsel for Co-defendant Bergen County Prosecutor's Office re: overdue discovery.	0.20	\$28.00
10/23/2018	JB	Prepare email correspondence to Plaintiff's counsel re: discovery.	0.10	\$14.00
10/24/2018	JB	Receipt and review Plaintiff's answers to interrogatories.	0.20	\$28.00
10/24/2018	JB	Receipt and review Plaintiff's response to our notice to produce.	0.50	\$70.00
10/24/2018	JB	Prepare summary of Plaintiff's answers to our combined discovery demands to the company.	0.50	\$70.00
10/24/2018	JB	Prepare written correspondence to Plaintiff requesting more specific answers to interrogatories.	0.30	\$42.00
10/24/2018	JB	Prepare index of Plaintiff's document production, BR0001-0684.	1.70	\$238.00
10/24/2018	JB	Update/revise memo re: chronology.	0.50	\$70.00
10/24/2018	JB	Update/revise memo re: persons of interest.	0.30	\$42.00
10/24/2018	MM	review and analyze plaintiff's discovery responses	1.10	\$176.00
10/26/2018	EC	Prepare trial binder	0.50	\$37.50
Billable Hours / Fees:			9.10	\$1,293.50

Timekeeper Summary

Timekeeper JB worked 6.00 hours at \$140.00 per hour, totaling \$840.00.

Timekeeper MM worked 2.60 hours at \$160.00 per hour, totaling \$416.00.

Timekeeper EC worked 0.50 hours at \$75.00 per hour, totaling \$37.50.

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

11/5/2018
Page: 3

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/11/2018	Check Number - 56991 against Inv# 1296	(\$540.00)
10/29/2018	Check Number - 5074 against Inv# 1228	(\$148.25)
10/29/2018	Check Number - 5074 against Inv# 1296	(\$180.00)
Total Payments Received:		(\$868.25)

Current Invoice Summary

Prior Balance:	\$868.25	
Payments Received:	(\$868.25)	Last Payment: 10/29/2018
Unpaid Prior Balance:	\$0.00	
Current Fees:	\$1,293.50	
Advanced Costs:	\$0.00	
TOTAL AMOUNT DUE:	\$1,293.50	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

December 03, 2018

Invoice No. 1437

Summit Risk Services
Ryan Thomas
120 Gibraltar Road, Suite 210
CC: JOHN MARKEL
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 Fehl v. Borough of Wallington, et al.

Claim Number: QM-1030

File Number: 024-4788

Summit Risk sharing cost (25%) with SBJIF (75%)
For Services Rendered Through 11/30/2018.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/2/2018	DP	Receipt and review e-mail from plaintiff re: co-def dep	0.10	\$16.00
11/5/2018	MM	draft email to client re: discovery responses	0.30	\$48.00
11/5/2018	MM	telephone conference with Mayor Tomko re: discovery	0.20	\$32.00
11/5/2018	MM	draft/revise answers to interrogatories on behalf of Boro	0.30	\$48.00
11/5/2018	MM	draft/revise 90 day report in final form	0.20	\$32.00
11/6/2018	JB	Telephone conference with Plaintiff's counsel re: ongoing discovery and deposition dates.	0.20	\$28.00
11/6/2018	JB	Receipt and review email correspondence from Plaintiff's counsel re: ongoing discovery and deposition dates.	0.10	\$14.00
11/6/2018	JB	Receipt and review second email correspondence from Plaintiff's counsel re: ongoing discovery and deposition dates.	0.10	\$14.00
11/6/2018	MM	review correspondence from plaintiff re: depositions/discovery	0.10	\$16.00
11/6/2018	MM	draft correspondence to plaintiff re: depositions/discovery	0.10	\$16.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

12/3/2018
Page: 2

11/6/2018	MM	review correspondence from codefendant re: deposition	0.10	\$16.00
11/7/2018	YR	telephone conference with Capt Kudlacik re: deposition	0.10	\$7.50
11/12/2018	JB	Receipt and review email correspondence from Plaintiff confirming conference call.	0.10	\$14.00
11/12/2018	YR	telephone conference with chambers re: phone conference with judge and all parties	0.10	\$7.50
11/12/2018	MM	review correspondence from plaintiff re: conference call with Court	0.10	\$16.00
11/13/2018	MM	review and analyze file in preparation for conference with court	0.40	\$64.00
11/13/2018	MM	telephone conference with all parties and Judge Waldor	0.20	\$32.00
11/13/2018	MM	draft email to plaintiff re: discovery/conference call	0.10	\$16.00
11/13/2018	MM	draft email to codefendant re: status	0.10	\$16.00
11/13/2018	MM	review email from Court re: conference held	0.10	\$16.00
11/13/2018	MM	review text order from court re: new conference date	0.10	\$16.00
11/13/2018	DB	e-mail borough administrator re: defense meeting/written discovery	0.10	\$7.50
11/19/2018	DB	telephone conference with borough administrator, councilwoman and borough attorney re: written discovery	0.20	\$15.00
11/19/2018	MM	telephone conference with client re: discovery	0.30	\$48.00
11/19/2018	MM	draft letter to Borough Administrator re: information required to complete interrogatories	0.30	\$48.00
11/26/2018	JB	Review file re: outstanding discovery.	0.20	\$28.00
11/26/2018	JB	Prepare written correspondence to Co-defendant BCPO re: outstanding response to our notice to produce.	0.20	\$28.00
11/28/2018	MM	Draft letter to Administrator re: discovery	0.20	\$32.00
11/29/2018	MM	draft letter to client re: overdue discovery	0.20	\$32.00
Billable Hours / Fees:			4.90	\$723.50

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

12/3/2018
Page: 3

Timekeeper Summary

Timekeeper YR worked 0.20 hours at \$75.00 per hour, totaling \$15.00.
Timekeeper MM worked 3.40 hours at \$160.00 per hour, totaling \$544.00.
Timekeeper JB worked 0.90 hours at \$140.00 per hour, totaling \$126.00.
Timekeeper DP worked 0.10 hours at \$160.00 per hour, totaling \$16.00.
Timekeeper DB worked 0.30 hours at \$75.00 per hour, totaling \$22.50.

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
11/15/2018	Check Number - 57272 against Inv# 1369	(\$970.13)
Total Payments Received:		(\$970.13)

Current Invoice Summary

Prior Balance:	\$1,293.50	
Payments Received:	(\$970.13)	Last Payment: 11/15/2018
Unpaid Prior Balance:	\$323.37	
Current Fees:	\$723.50	
Advanced Costs:	\$0.00	
TOTAL AMOUNT DUE:	\$1,046.87	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

January 03, 2019

Invoice No. 1534

Summit Risk Services
Ryan Thomas
120 Gibraltar Road, Suite 210
CC: JOHN MARKEL
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 Fehl v. Borough of Wallington, et al.

Claim Number: QM-1030
File Number: 024-4788

Summit Risk sharing cost (25%) with SBJIF (75%)
For Services Rendered Through 12/31/2018.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/11/2018	JB	Review file re: outstanding discovery.	0.10	\$14.00
12/11/2018	JB	Prepare extended email correspondence to client re: outstanding discovery.	0.20	\$28.00
12/11/2018	JB	Telephone conference with client re: outstanding discovery.	0.10	\$14.00
12/19/2018	JB	Review file re: outstanding discovery.	0.20	\$28.00
12/19/2018	JB	Prepare written correspondence to co-defendant re: outstanding discovery.	0.20	\$28.00
Billable Hours / Fees:			0.80	\$112.00

Timekeeper Summary

Timekeeper JB worked 0.80 hours at \$140.00 per hour, totaling \$112.00.

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

1/3/2019
Page: 2

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
12/17/2018	Check Number 57469 against Inv# 1437	(\$219.26)
12/17/2018	Check Number 57469 against Inv# 1369 (Prior Balance on Inv# 1437)	(\$323.37)
Total Payments Received:		<u>(\$542.63)</u>

Current Invoice Summary

Prior Balance:	\$1,046.87	
Payments Received:	<u>(\$542.63)</u>	Last Payment: 12/17/2018
Unpaid Prior Balance:	\$504.24	
Current Fees:	\$112.00	
Advanced Costs:	\$0.00	
TOTAL AMOUNT DUE:	<u><u>\$616.24</u></u>	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

February 01, 2019

Invoice No. 1637

Summit Risk Services
Ryan Thomas
120 Gibraltar Road, Suite 210
CC: JOHN MARKEL
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 Fehl v. Borough of Wallington, et al.

Claim Number: QM-1030

File Number: 024-4788

For Services Rendered Through 1/31/2019.

<u>Date</u>	<u>Timekeeper</u>	<u>Fees</u> <u>Description</u>	<u>Hours</u>	<u>Amount</u>
1/2/2019	MM	review and analyze codefendant's answers to plaintiff's interrogatories	0.20	\$32.00
1/2/2019	MM	telephone conference with client re: discovery responses	0.20	\$32.00
1/2/2019	MM	draft email to client re: overdue discovery responses	0.20	\$32.00
1/4/2019	JB	Telephone conference with co-defendant Bergen County Prosecutor's Office re: outstanding discovery.	0.10	\$14.00
1/4/2019	JB	Second telephone conference with co-defendant Bergen County Prosecutor's Office re: outstanding discovery.	0.10	\$14.00
1/4/2019	JB	Prepare email correspondence to co-defendant Bergen County Prosecutor's Office re: outstanding discovery.	0.10	\$14.00
1/7/2019	MM	review correspondence from plaintiff re: overdue discovery	0.10	\$16.00
1/7/2019	MM	review correspondence from codefendant BCPO re: records	0.10	\$16.00
1/7/2019	MM	draft correspondence to codefendant re: BCPO records	0.10	\$16.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

2/1/2019
Page: 2

1/10/2019	JB	Review file re: outstanding discovery owed to Plaintiff.	0.20	\$28.00
1/10/2019	JB	Extended telephone conference with newly appointed borough administrator re: outstanding discovery demands owed to Plaintiff.	0.20	\$28.00
1/10/2019	JB	Prepare extensive email correspondence to newly appointed borough administrator re: outstanding discovery demands owed to Plaintiff and enclosing draft discovery responses.	0.40	\$56.00
1/14/2019	JB	Telephone conference with client (Kudlacik) re: status of discovery.	0.10	\$14.00
1/15/2019	JB	Telephone conference with Plaintiff re: outstanding discovery.	0.10	\$14.00
1/15/2019	JB	Prepare email to Plaintiff re: outstanding discovery.	0.20	\$28.00
1/16/2019	MM	review correspondence from plaintiff re: discovery	0.10	\$16.00
1/16/2019	JB	Receipt and review email correspondence from Plaintiff re: discovery	0.10	\$14.00
1/16/2019	JB	Email correspondence to Plaintiff re: discovery	0.10	\$14.00
1/21/2019	JB	Review file re: outstanding discovery from co-defendant Bergen County prosecutor's office.	0.20	\$28.00
1/21/2019	JB	Email to co-defendant Bergen County prosecutor's office re: outstanding discovery.	0.10	\$14.00
1/21/2019	JB	Review file in preparation of drafting third 90 day litigation report.	0.50	\$70.00
1/22/2019	JB	Receipt and review email correspondence from client re: outstanding discovery.	0.10	\$14.00
1/22/2019	JB	prepare email correspondence to client re: outstanding discovery.	0.10	\$14.00
1/25/2019	JB	Receipt and review email correspondence from Client (Borough) re: discovery responses/documents.	0.10	\$14.00
1/25/2019	JB	Email correspondence to Client (Borough) re: discovery responses/documents.	0.10	\$14.00
1/25/2019	JB	Begin drafting third 90 day litigation report.	0.80	\$112.00
1/25/2019	MM	review correspondence from plaintiff re: conference call	0.10	\$16.00
1/28/2019	JB	Receipt and review email correspondence from Plaintiff re: their outstanding document production.	0.10	\$14.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

2/1/2019
Page: 3

1/28/2019	JB	Review previous correspondences to/from Plaintiff re: outstanding document production.	0.20	\$28.00
1/28/2019	JB	Prepare email correspondence to Plaintiff re: their outstanding document production.	0.10	\$14.00
1/28/2019	MM	preparation for conference call with Court and all counsel	0.50	\$80.00
1/28/2019	MM	attendance at conference call with Judge Waldor and all counsel	0.40	\$64.00
1/28/2019	MM	review email from plaintiff re: conference call	0.10	\$16.00
1/28/2019	DP	Receipt and review minute entry from Court re: telephone conference	0.10	\$16.00
1/28/2019	DP	Receipt and review text order from Court re: extension of discovery/status conference	0.10	\$16.00
1/28/2019	DP	Correspondence to company re: status/status conference	0.20	\$32.00
1/28/2019	MM	review second text order from court re: extending discovery	0.10	\$16.00
1/31/2019	MM	review correspondence from client re: discovery responses	0.10	\$16.00
1/31/2019	JB	Receipt/review document production from Client (Borough).	0.60	\$84.00
1/31/2019	JB	Draft/revise detailed answers to interrogatories on behalf of Borough.	0.60	\$84.00
1/31/2019	JB	Draft/revise detailed response to notice to produce on behalf of Borough.	0.50	\$70.00
1/31/2019	JB	Extended email correspondence to client (Borough) re: document production.	0.20	\$28.00

Billable Hours / Fees: 8.70 \$1,272.00

Timekeeper Summary

Timekeeper JB worked 6.00 hours at \$140.00 per hour, totaling \$840.00.

Timekeeper MM worked 2.30 hours at \$160.00 per hour, totaling \$368.00.

Timekeeper DP worked 0.40 hours at \$160.00 per hour, totaling \$64.00.

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

2/1/2019
Page: 4

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
1/9/2019	Check Number - 57646 against Inv# 1534	(\$84.00)
Total Payments Received:		(\$84.00)

Current Invoice Summary

Prior Balance:	\$616.24	
Payments Received:	(\$84.00)	Last Payment: 1/9/2019
Unpaid Prior Balance:	\$532.24	
Current Fees:	\$1,272.00	
Advanced Costs:	\$0.00	
TOTAL AMOUNT DUE:	\$1,804.24	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

BOTTA ANGELI, LLC
Counsellors At Law
50 South Franklin Turnpike
Ramsey, New Jersey 07446
(201) 818-6400

Summit Risk Services
120 Gibraltar Road
Suite 210
Horsham, PA 19044

Attn: Ryan R. Thomas

Page: 1
November 08, 2018
Client No.: 3478-054

Re: Wallington adv. Fehl
Case # 2:17-CV-11462-KSH-CLW
Claim # QM-1030
Tax Id. # 26-2748605

FOR PROFESSIONAL SERVICES RENDERED
in connection with the above captioned matter

Fees

	Hours	
10/15/18		
CCB Receipt and analysis of letter from counsel re: depositions	0.20	
10/18/18		
CCB Receipt and analysis of memo from Mr. Thomas, re: Mediation	0.20	
10/19/18		
CCB Receipt and analysis of letter and discovery responses from plaintiff; notes to file	1.50	
10/22/18		
CCB Prepare memo to file, re: discovery responses to be prepared	0.30	
	<u>2.20</u>	<u>352.00</u>
TOTAL CURRENT FEES	2.20	352.00

<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Senior Partner	2.20	\$160.00	\$352.00

Summit Risk Services

Page: 2
November 08, 2018
Client No.: 3478-054

Re: Wallington adv. Fehl
Case # 2:17-CV-11462-KSH-CLW
Claim # QM-1030
Tax Id. # 26-2748605

TOTAL CURRENT WORK	352.00
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PREVIOUS BALANCE	\$480.00
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Payments

10/29/18 Fee Payment Received - Thank You	-480.00
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TOTAL STATEMENT	<u>\$352.00</u>
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BOTTA ANGELI, LLC
Counsellors At Law
50 South Franklin Turnpike
Ramsey, New Jersey 07446
(201) 818-6400

Summit Risk Services
120 Gibraltar Road
Suite 210
Horsham, PA 19044

Page: 1
December 07, 2018
Client No.: 3478-054

Attn: Ryan R. Thomas

Re: Wallington adv. Fehl
Case # 2:17-CV-11462-KSH-CLW
Claim # QM-1030
Tax Id. # 26-2748605

FOR PROFESSIONAL SERVICES RENDERED
in connection with the above captioned matter

Fees

Hours

11/05/18		
CCB	Telephone conference with plaintiff's counsel re: status and discovery; notes to file re: schedule for discovery	0.60
11/06/18		
CCB	Receipt and analysis of letter from plaintiff's counsel, re: discovery; memo to file	0.40
	CCB Receipt and analysis of memo from Ms. McDonnell, Esq., re: adjournment of deposition; respond to same	0.40
11/12/18		
RFM	Attention to status; review and prepare for status conference; prepare memo to file	0.80
	CCB Receipt and analysis of memo from counsel, re: Conference status	0.20

Re: Wallington adv. Fehl
Case # 2:17-CV-11462-KSH-CLW
Claim # QM-1030
Tax Id. # 26-2748605

	Hours	
11/13/18		
RFM Telephone conference call with all counsel and the Court re. status and discovery; prepare memo to file	0.80	
CCB Attention to status of discovery; review new Court notice; attention to memo from co-defendant's counsel; memo to file	0.50	
11/14/18		
RFM Receive, review and process co-defendant Shawn Kudlack's discovery responses with attachments	1.00	
11/15/18		
RFM Receive, review and process plaintiff's answers to interrogatories, Notice to Produce and attached documents bates stamped 1-684	2.80	
CCB Receipt and analysis of memo from Mr. Thomas	0.20	
11/16/18		
RFM Outline, organize and prepare memo to file re. summary and analysis of plaintiff's answers to interrogatories and document production	1.00	
11/19/18		
RFM Outline, organize and prepare continued memo to file re. summary and analysis of plaintiff's answers to interrogatories and document production and co-defendant's answers to discovery and document production	2.40	
TOTAL CURRENT FEES	11.10	1,600.00

Title	Hours	Rate	Total
Senior Partner	2.30	\$160.00	\$368.00
Senior Associate	8.80	140.00	1,232.00